

<p>1 Thursday, 18 September 2014 2 (9.30 am) 3 MR MARK EDWARD COBB (continued) 4 Questions from MR POPAT (continued) 5 THE CORONER: Mr Popat, can I just say this, lest there is 6 an opportunity for you to deal with it. I would be 7 helped, I think, if at some point you were able to go 8 through as a discrete topic the organisational 9 structure, particularly so far as security is concerned. 10 I am obviously not as familiar with it as all of you are 11 but I have heard about liaison and JOC and so on, but 12 I think I would find it helpful if that was dealt with 13 not as it were, simply incidentally because it has 14 cropped up on occasions. Can I leave that with you? 15 MR POPAT: Yes, sir. 16 THE CORONER: Maybe you were going to touch on it. I can 17 obviously ask about it myself but it might be better if 18 it was dealt with from the knowledge base that you will 19 have, at any point. I will leave it with you. 20 MR POPAT: Thank you, sir. I will certainly deal with that 21 as best I can with Mr Cobb. It is something that 22 I would expect to be dealt with by Mr Collins and to 23 another extent Mr Johnson. 24 THE CORONER: No, quite. I mention this once more but never 25 again. If anywhere you are sitting on, or those who</p> <p style="text-align: center;">Page 1</p>	<p>1 Q. I was trying to find an organogram which might help with 2 the consideration. 3 THE CORONER: I am conscious, Mr Popat, that Mr Collins may 4 be going to deal with some of it. What I just don't 5 want to miss is the opportunity to have this witness's 6 perspective on it and how he fed in and what you saw as 7 to your responsibility within it. That's the only 8 thing -- 9 MR POPAT: Certainly when dealing with security specifically 10 and liaison and how that feeds into the structure we'll 11 look at that in a little more detail. But perhaps more 12 generally, Mr Antrobus, no doubt will be able to find 13 a very useful organogram which is in the papers to guide 14 us through it. 15 Mr Cobb, just so we are clear, JV made up of the 16 three partners, Sonatrach having the majority share with 17 the two other partners having equal shares of the rest? 18 <b>A. That's correct.</b> 19 Q. CdG, the body set up to be populated by representatives 20 from each of the partner companies providing an 21 oversight and particularly budgetary approval and 22 control? 23 <b>A. That's correct.</b> 24 Q. JOC, and for the coroner's note, sometimes there are 25 references to the JOB as well, aren't there, in the</p> <p style="text-align: center;">Page 3</p>
<p>1 instruct you have what I am really keen to get my hands 2 on, I am just going to show it to you, it is about this 3 wide and it would be about that deep, high, but just on 4 an -- showing the overall site, all right, so the VCPs, 5 the BdV, all that kind of thing, not on a photograph 6 from high up but a plan, just marking the double 7 fencing, where the barrier blocks are, how far that goes 8 round, where the unused towers are, whether there's 9 a gate that opens and closes, a chicane and so on, just 10 so that I have an overall view of security at the site. 11 It would be really helpful. And I suspect that when 12 other witnesses are coming I just think rather than 13 having to reach for different plans, if we all had one 14 main one that we were working from, I have a feeling 15 that might be useful but I won't mention it again. 16 MR POPAT: No, sir, it is noted and it will be done. I will 17 make sure one is provided. 18 THE CORONER: Thank you very much. 19 MR POPAT: Mr Cobb, I was going to proceed to deal with the 20 military with you, but in largely for the coroner's 21 request, may we just go back a stage and discuss the 22 structure within the JV and provide an explanation of 23 what roles were fulfilled by which people and which 24 departments. 25 <b>A. Sure.</b></p> <p style="text-align: center;">Page 2</p>	<p>1 papers in the materials, the Joint Operating Body? 2 THE CORONER: What does the C stand for in JOC? 3 MR POPAT: Committee. 4 The Joint Operating Committee, the JOC, was the 5 management board, if you like, of the JV? 6 <b>A. That's a fair representation.</b> 7 Q. And that too is populated by representatives from the 8 three partner companies in the way you described 9 yesterday, general manager, deputy general manager and 10 an operations manager? 11 <b>A. That's correct.</b> 12 Q. And there is rotation between those posts, again in the 13 way you described yesterday? 14 <b>A. That's correct.</b> 15 Q. JOB? 16 <b>A. I've heard the term JOB before but to me it is the same 17 thing as a JOC. It is that grouping of three senior 18 managers from the three partner companies who 19 fundamentally ran the business on a day-to-day basis.</b> 20 Q. Thank you. And as predicted Mr Antrobus has been able 21 to find the best organogram I think in the papers, so 22 I am afraid it requires going to core bundle 2. 23 THE CORONER: Do you have a page or a tab number? 24 MR POPAT: Tab 8, page 387. This comes from the Statoil 25 report and is very much an overview, Mr Cobb, but does</p> <p style="text-align: center;">Page 4</p>

<p>1 it accurately record what we have just discussed, 2 partners at the top, the legal framework that binds the 3 venture as the production sharing contract. The 4 governing bodies are the CdG and below it the JOC, also 5 sometimes, as you have explained referred to as the JOB. 6 Within the JOB, which is the box to the left, we see the 7 general manager who at the time of the attack was the 8 Sonatrach representative.</p> <p>9 <b>A. That's correct.</b></p> <p>10 Q. His name, please?</p> <p>11 <b>A. His name was Lotfi Benadouda at the time of the attack.</b></p> <p>12 Q. A line down from the general manager to the operations 13 and projects manager, but just off to the right with 14 a separate line into the general manager is the deputy 15 general manager, which was you?</p> <p>16 <b>A. That's correct.</b></p> <p>17 Q. And below the general manager we have the operations 18 manager and the projects manager. We didn't mention the 19 projects manager but what role does the projects manager 20 have?</p> <p>21 <b>A. The projects manager did not play a role within the JOC 22 itself. In the case of In Amenas there was an effort, 23 quite an effort to try to identify from one of the 24 partner companies a representative who would run the 25 In Amenas Compression Project which was a new project at</b></p> <p style="text-align: center;">Page 5</p>	<p>1 the same shares as In Amenas?</p> <p>2 <b>A. I believe so.</b></p> <p>3 Q. And with its own set up within the organisation at 4 In Salah?</p> <p>5 <b>A. That's correct. It had an independent JOC.</b></p> <p>6 Q. But there were shared departments, shared between 7 In Amenas and In Salah which are the departments 8 represented in the box to the right?</p> <p>9 <b>A. That's correct.</b></p> <p>10 Q. Of those we have four, subsurface wells, business 11 support and HSE, HSE standing for health, safety and 12 environment?</p> <p>13 <b>A. That's correct.</b></p> <p>14 Q. We don't need to consider three of those but just 15 looking at business support. Business support is 16 a shared department, shared between In Salah and 17 In Amenas and located at Hassi Messaoud?</p> <p>18 <b>A. That's correct.</b></p> <p>19 Q. And reporting to the business support section are the 20 various departments listed below it, finance, ITC, 21 supply chain, HR and liaison. Again, perhaps not 22 troubling with the first four, but looking just at 23 liaison, and we will come back to look at the liaison 24 team in a little more detail, but the liaison function 25 that you have repeatedly referenced and mentioned is</p> <p style="text-align: center;">Page 7</p>
<p>1 <b>site that had just kicked off at site within the last 2 year but had been ongoing outside the country for 3 a couple of years. So he didn't actually sit on the 4 JOC, he didn't have a vote on the JOC or the JOB and the 5 person who occupied that post was Nick Hitch.</b></p> <p>6 Q. And to the left is the operations manager who did sit on 7 the JOC and who was at the time of the attack a Statoil 8 representative?</p> <p>9 <b>A. That's correct, it was Tore Bech.</b></p> <p>10 Q. Mr Bech. Then to the right we see that there are 11 a number of what are called shared departments. When it 12 says "shared" what are they shared between or between 13 whom are they shared?</p> <p>14 <b>A. Those were for efficiency purposes, those were functions 15 that both In Amenas and In Salah required in order to 16 conduct their businesses, so for --</b></p> <p>17 Q. Pause there for a moment because you have mentioned 18 In Salah. There has been a few references to it but 19 I don't think anyone has explained what it was. 20 In Salah is another facility?</p> <p>21 <b>A. Yes, that's correct, In Salah operated under another 22 production sharing agreement with Sonatrach and BP as 23 well as Statoil were partners and that was a dry gas 24 field which was located further south of Hassi Messaoud.</b></p> <p>25 Q. So a different facility operated by the same partners in</p> <p style="text-align: center;">Page 6</p>	<p>1 this function, is it?</p> <p>2 <b>A. Yes. The --</b></p> <p>3 Q. And -- sorry?</p> <p>4 <b>A. I was just going to say this box would actually 5 represent not only the function but more specifically 6 the ALM, the Algerian Liaison Manager who was a direct 7 report to the business support manager.</b></p> <p>8 Q. So the liaison function would have a direct report to 9 the business support manager and then if we see how that 10 box in total fits into the structure we see the line 11 from the right to the left going into the JOB and it 12 joins the line going straight up to the general manager?</p> <p>13 <b>A. That's correct.</b></p> <p>14 Q. And dealing just with you personally, Mr Cobb, because 15 I think on many occasions you refer to your staff and 16 your liaison staff and other people who are within your 17 province, the functions in fact report in that way and 18 up to the general manager not to the deputy general 19 manager?</p> <p>20 <b>A. That is correct.</b></p> <p>21 Q. And whilst undoubtedly in the ways you have explained 22 you took a very active and healthy interest in security 23 that wasn't a function that fell within your province?</p> <p>24 <b>A. That was not my formal responsibility is the way I would 25 put it.</b></p> <p style="text-align: center;">Page 8</p>

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<p>1 THE CORONER: Does liaison actually mean security? Or if 2 not who is it liaising between? Who and what or does it 3 mean, or are you coming on to that? 4 MR POPAT: We will look at that in a fair bit of detail. 5 THE CORONER: No, I am going to leave it with you. 6 MR POPAT: If that is -- 7 THE CORONER: No, take it your own way. I am very grateful. 8 MR POPAT: As a function that function, and it is an odd 9 name and we'll come to look at why it's called liaison, 10 but that function reports in that way through to that 11 department and then from that department up to the 12 general manager? 13 <b>A. It -- yes, it would report in. Even though the block is 14 around this entire grouping of the variety of functions 15 the direct report in would be the business support 16 manager, okay. He was the shared resource that reported 17 in to the general managers on both sites, okay, and 18 having the primary responsibility for liaison is one of 19 the many functions that answer directly to him?</b> 20 Q. When talking about liaison there are obviously people 21 within the liaison department. You again have used 22 a number of acronyms which with all due respect, 23 Mr Cobb, you have sort of fired out at us. Many people 24 won't be that familiar with those acronyms and what they 25 stand for, but where you have made reference to anything</p> <p style="text-align: center;">Page 9</p>	<p>1 the thousands? 2 <b>A. Yes, in the thousands in the military zone.</b> 3 Q. With a garrison at In Amenas town? 4 <b>A. That was one garrison of many as I understand.</b> 5 Q. And within the military zone movement of vehicles and 6 people was restricted by the requirements to have 7 certain passes and permits to permit movement around the 8 zone? 9 <b>A. The term I would use it was highly controlled, yes.</b> 10 Q. Insofar as permits and passes were provided to Algerian 11 nationals, they were provided by the government or 12 government bodies following checks and security checks 13 and criminal record checks? 14 <b>A. That's correct, as well as for the expats.</b> 15 Q. From everything you understand was the military aware of 16 its responsibility for the security of the military 17 zone? 18 <b>A. Yes.</b> 19 Q. You were asked yesterday whether the zone would still be 20 there, the military zone, even if In Amenas was not 21 there and you said yes. But was it there to provide 22 security, military protection for the hydrocarbon 23 region? 24 <b>A. Yes.</b> 25 Q. So is it right that it would not have been there were it</p> <p style="text-align: center;">Page 11</p>
<p>1 I think which has an L in it, ALM, OLC, OLS and whatever 2 else, OLA I think is the other one, the L in those 3 acronyms stands for "liaison"? 4 <b>A. That's correct.</b> 5 Q. And we will, as I say, come back to look at the function 6 performed by the liaison team and who the people were 7 who populated that department. 8 <b>A. Okay.</b> 9 Q. May I then move on to the topic of the military. And 10 just reminding you and everyone else, we looked at the 11 graphic yesterday which showed the different rings of 12 security, border guards, military in the military zone, 13 Gendarmes in the Gendarme zone and then what is called 14 the inner security at the camp itself. You recall? 15 <b>A. Yes, I do.</b> 16 Q. Border guards are part of the military? 17 <b>A. I assume so, they're a government force. Whether they 18 were entirely independent or part of the military I'm 19 not entirely sure.</b> 20 Q. And then within the military zone we have the military, 21 as you recognised it? 22 <b>A. That's correct.</b> 23 Q. I am not sure if you did give an idea yesterday, there 24 are documents which provide some references, but the 25 numbers of troops in the military zone are measured in</p> <p style="text-align: center;">Page 10</p>	<p>1 not for the oil and gas facilities within the 2 hydrocarbon region? 3 <b>A. I think that's a fair statement.</b> 4 Q. And the oil and gas facilities within the military zone, 5 were they national organisations, ie Algerian entities, 6 or foreign ventures where there was a combination 7 between foreign companies and Sonatrach? 8 <b>A. It would be both.</b> 9 Q. Were there so far as you are aware any foreign oil and 10 gas facilities, and by that I am referring to a model 11 like the one that operated in In Amenas, were there any 12 foreign oil and gas facilities outside the military 13 zone? 14 <b>A. To my knowledge no, not that I'm aware of.</b> 15 Q. Again, just to help us with the landscape, what sort of 16 numbers of oil and gas facilities operated within the 17 military zone? 18 <b>A. I wouldn't have an exact idea. It was a large number, 19 you know, maybe 100, maybe even more, there was large 20 fields, there were small fields, there was oil 21 production operations, there was gas operations, there 22 was mixed oil and gas operations, just a variety of 23 operations.</b> 24 Q. Within the military zone were there districts or wilayas 25 which were governing parts of the military zone?</p> <p style="text-align: center;">Page 12</p>

<p>1 <b>A. That's correct.</b></p> <p>2 Q. And those districts or wilayas were governed by a local</p> <p>3 government framework with a person at the head of that</p> <p>4 framework?</p> <p>5 <b>A. Yes, I believe we fell into the fourth military region</b></p> <p>6 <b>and ultimately the Wilaya that we fell within was the</b></p> <p>7 <b>Wilaya of Illizi which is the same place we were</b></p> <p>8 <b>required to submit a security plan to the authorities</b></p> <p>9 <b>for approval.</b></p> <p>10 Q. So within the military zone districts and the reporting</p> <p>11 or the governance of that part of the district is</p> <p>12 carried out by the particular Wilaya that is responsible</p> <p>13 for that area?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. Security plans are submitted to that Wilaya?</p> <p>16 <b>A. That's correct.</b></p> <p>17 Q. And they are responsible for the provision of military</p> <p>18 protection for the district in which they operate?</p> <p>19 <b>A. That's correct.</b></p> <p>20 Q. Within the military zone as far as you are aware, were</p> <p>21 the military carrying out and responsible for carrying</p> <p>22 out a number of patrols?</p> <p>23 <b>A. As far as I'm aware, yes.</b></p> <p>24 Q. Just because it may be the quickest way of looking at</p> <p>25 it, it is a document you were referred to yesterday by</p> <p style="text-align: center;">Page 13</p>	<p>1 Did that represent your understanding of the nature</p> <p>2 and type of patrols that were being undertaken by the</p> <p>3 military in the military zone?</p> <p>4 <b>A. Yes, very clearly. I might add that it was about this</b></p> <p>5 <b>same timeframe as I mentioned yesterday that we were</b></p> <p>6 <b>approached by the military to warn us that they would be</b></p> <p>7 <b>doing exercises within our general operations area and</b></p> <p>8 <b>in fact, you could hear tank fire in the far distance.</b></p> <p>9 <b>So they did manoeuvres, there was troop movements</b></p> <p>10 <b>throughout, below the falaise into of the desert area.</b></p> <p>11 <b>They obviously could not come in round the well sites</b></p> <p>12 <b>themselves because of the danger involved of having any</b></p> <p>13 <b>kind of live fire exercises with live hydrocarbon</b></p> <p>14 <b>facilities, wells in this case. But they were regularly</b></p> <p>15 <b>sighted by the liaison team and they communicated that</b></p> <p>16 <b>to the staff on site.</b></p> <p>17 Q. You were asked a number of questions about effectively</p> <p>18 liaison with the military. Was there a direct route</p> <p>19 from the JV, and by that I mean, let's take the members</p> <p>20 of the JOC or the management just below it, a direct</p> <p>21 route to the military from that place?</p> <p>22 <b>A. No, not direct from In Amenas. It's through Sonatrach.</b></p> <p>23 Q. The interaction if any with the military would occur</p> <p>24 through which department within the JV set up to</p> <p>25 Sonatrach to make requests, for example, for military</p> <p style="text-align: center;">Page 15</p>
<p>1 Mr Ritchie in his orange bundle behind divider 6,</p> <p>2 please. This is an extract from a liaison weekly</p> <p>3 meeting and procedure update. It is produced by the</p> <p>4 liaison team. It is dated May 2011 and we'll look at</p> <p>5 some of these in another location shortly, but this is</p> <p>6 an extract from one of them and we see it lists things</p> <p>7 happening in the north and then in the south and in</p> <p>8 relation to the south we see it said:</p> <p>9 "Security plan for the protection of foreign oil and</p> <p>10 gas companies."</p> <p>11 And then references to different people who have:</p> <p>12 "Decided to reinforce all foreign oil and gas</p> <p>13 companies in the nine southern wilayas."</p> <p>14 Those are the districts we have been talking about?</p> <p>15 <b>A. Yes, that's correct.</b></p> <p>16 Q. "The installation of Saharan military bases for the</p> <p>17 control and surveillance of oil and gas installations is</p> <p>18 well underway [and this is May 2011], with sightings of</p> <p>19 regular troop movements in the In Amenas area and</p> <p>20 through the IA operations work zone.</p> <p>21 "Combined forces of the security services have begun</p> <p>22 24 x hour desert patrols and will be targeting</p> <p>23 smugglers, bandits and possible infiltration of AQIM</p> <p>24 from Libya. [Held] there for the protection of</p> <p>25 personnel and to safeguard IA OPS assets."</p> <p style="text-align: center;">Page 14</p>	<p>1 protection or additional escorts or the like?</p> <p>2 <b>A. That would be liaison.</b></p> <p>3 Q. I am sorry to ask you to turn to a different bundle. We</p> <p>4 can put the orange bundle to one side just for the</p> <p>5 moment and go, please, to core bundle 1 which is I think</p> <p>6 the green bundle and divider 12, please. Just behind</p> <p>7 divider 12 is a BP regional security management plan,</p> <p>8 not a JV regional security management plan and we don't</p> <p>9 need to look at it in any detail with you, apart from</p> <p>10 just looking, please, at page 58 -- I'm sorry, it is not</p> <p>11 page 58. If you can take the page numbering at the top</p> <p>12 right-hand corner, Mr Cobb, and turn, please, to</p> <p>13 page 23.</p> <p>14 <b>A. Okay, I'm there.</b></p> <p>15 Q. This is headed "Making requests for military protection</p> <p>16 or escorts", and military protection would include, and</p> <p>17 perhaps specifically be, military protection for</p> <p>18 particular installations or sites which required that</p> <p>19 sort of protection; is that right?</p> <p>20 <b>A. I'm not familiar with this document, but the way, if</b></p> <p>21 <b>you're referring to section 1, this would be for mobile,</b></p> <p>22 <b>I'll call them mobile operations, not static operations,</b></p> <p>23 <b>and I refer to mobile in the sense of drilling</b></p> <p>24 <b>operations. I am sure that this existed for BP because</b></p> <p>25 <b>BP did 100 per cent exploration operations in the field</b></p> <p style="text-align: center;">Page 16</p>

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<p>1 <b>aside from the operations of the JVs. So these are the</b></p> <p>2 <b>protocols that would have to be followed by them in</b></p> <p>3 <b>order to have military protection at their sites and to</b></p> <p>4 <b>be able to arrange escorts to and from their sites.</b></p> <p>5 Q. Thank you. That was the distinction I was seeking to</p> <p>6 understand with you. The military zone is protected by</p> <p>7 the military. It has its responsibilities and its</p> <p>8 organisations, rather like any military in any country,</p> <p>9 for determining how to carry out the protection provided</p> <p>10 in the military zone; is that right?</p> <p>11 <b>A. That's correct.</b></p> <p>12 Q. It may become necessary to seek specific military</p> <p>13 protection for particular installations or sites such as</p> <p>14 a mobile rig where things are going to move and new</p> <p>15 things are going to be created and additional military</p> <p>16 protection required?</p> <p>17 <b>A. That's correct.</b></p> <p>18 Q. It may also be necessary to arrange for escorts to be</p> <p>19 provided for certain staff or categories of staff when</p> <p>20 they're carrying out certain activities?</p> <p>21 <b>A. Correct.</b></p> <p>22 Q. And the route for making the requests for seeking that</p> <p>23 sort of military protection, either for the mobile rigs</p> <p>24 or for the escorts, would be carried out through</p> <p>25 a process, and we don't need to look at the detail of</p> <p style="text-align: center;">Page 17</p>	<p>1 Q. Again, so we get an idea of the scale of operations, we</p> <p>2 know of course there was a Gendarme base or camp at</p> <p>3 In Amenas?</p> <p>4 <b>A. That's correct.</b></p> <p>5 Q. But is it right that there were Gendarme camps in</p> <p>6 a number of places within the, what's shown in the</p> <p>7 graphic as a Gendarme protected zone?</p> <p>8 <b>A. Yes, we also had Gendarme camps at both of our mobile</b></p> <p>9 <b>drilling rigs in addition.</b></p> <p>10 Q. And beyond the In Amenas drilling rigs and In Amenas</p> <p>11 facilities there were other Gendarme camps within a zone</p> <p>12 where the Gendarmes were responsible for providing the</p> <p>13 protection?</p> <p>14 <b>A. Yes, there was a main Gendarmerie located in In Amenas</b></p> <p>15 <b>town itself. I don't know for a fact but I would</b></p> <p>16 <b>suspect that there would be Gendarme facilities on most,</b></p> <p>17 <b>if not all of the oil and gas facilities who had foreign</b></p> <p>18 <b>partnerships.</b></p> <p>19 Q. In relation to the Gendarmes who was responsible for</p> <p>20 determining their location, their base and the weaponry</p> <p>21 they were going to be supplied with and their numbers</p> <p>22 and so on?</p> <p>23 <b>A. That would be the Gendarmes themselves.</b></p> <p>24 Q. Would they be governed by the particular district that</p> <p>25 pertains to that area in the same way?</p> <p style="text-align: center;">Page 19</p>
<p>1 this, but through a process which would lead from the</p> <p>2 liaison team making a request through to Sonatrach who</p> <p>3 in turn would be making the request to the, and I don't</p> <p>4 think you have established this, but the wadi of the</p> <p>5 particular district that we are dealing with.</p> <p>6 <b>A. The Wali.</b></p> <p>7 Q. Sorry, the Wali.</p> <p>8 <b>A. Yeah.</b></p> <p>9 Q. Of the particular district we are dealing with. And the</p> <p>10 Wali is effectively the governor of that district?</p> <p>11 <b>A. The governor, yes.</b></p> <p>12 Q. The military, as you saw it and were aware of them, were</p> <p>13 very heavily armed, large in numbers and very familiar</p> <p>14 with fighting terrorists?</p> <p>15 <b>A. That was my observation, yes.</b></p> <p>16 Q. And that zone, that military zone, which we saw in the</p> <p>17 graphic we looked at yesterday as a rectangle number 2,</p> <p>18 I think, was the military zone which surrounded the</p> <p>19 hydrocarbon region and included, therefore, the</p> <p>20 In Amenas facility?</p> <p>21 <b>A. That's correct.</b></p> <p>22 Q. The next zone which was identified in the graphic we</p> <p>23 looked at yesterday, zone number 2, was the zone</p> <p>24 protected by the Gendarmes?</p> <p>25 <b>A. That's correct.</b></p> <p style="text-align: center;">Page 18</p>	<p>1 <b>A. That was my understanding. I believe that the</b></p> <p>2 <b>Gendarmerie that we had on site reported back in through</b></p> <p>3 <b>the fourth military district to a Gendarme headquarter</b></p> <p>4 <b>within that district.</b></p> <p>5 Q. Again, as far as you are aware, were the Gendarmes aware</p> <p>6 of their responsibilities for protecting the site or the</p> <p>7 zone that they protected?</p> <p>8 <b>A. I think they were very well aware of their</b></p> <p>9 <b>responsibilities as evidenced by the comment made to me</b></p> <p>10 <b>by Captain Hocine that his sole reason in fact the way</b></p> <p>11 <b>he put it his sole reason for being there was to ensure</b></p> <p>12 <b>the protection of the expats on that site.</b></p> <p>13 Q. You were asked a number of questions about the zones</p> <p>14 that they protected or patrolled, and I wonder if you</p> <p>15 would again look at a document with me at -- I am</p> <p>16 afraid, sir, it is core bundle 1 which I think you have</p> <p>17 just put back. We will probably need to look at a few</p> <p>18 documents in this bundle shortly.</p> <p>19 Divider 11, please. This is the -- you see at</p> <p>20 page 90, behind divider 11, it is the security</p> <p>21 management plan. It has the legends of the JV companies</p> <p>22 on the top and if you turn, please, just to page 92, you</p> <p>23 see the large box at the top, Mr Cobb. We see that this</p> <p>24 document has been amended. It is a controlled document</p> <p>25 so it has to go through different processes if people</p> <p style="text-align: center;">Page 20</p>

<p>1 want to amend it and we see on the right-hand side the 2 identity of those responsible for updating it 3 from June 2009.</p> <p>4 They are referred to as IA and HMD liaison. Is that 5 the same liaison function or team that we have been 6 talking about which we saw on that little diagram in the 7 organogram?</p> <p>8 <b>A. Yes, it is.</b></p> <p>9 Q. So they produce this document and we will need to look 10 at this in a little detail in another context shortly 11 but just for the present purposes can we look just at 12 a few paragraphs. On page 92 under the heading 13 "General", third paragraph down it says:</p> <p>14 "In response to the current security environment 15 within Algeria Algerian law dictates certain security 16 requirements to be complied with by all foreign 17 operators with regards to expatriate personnel and 18 installations. The most significant of these is the 19 mandatory presence of a military protection for all 20 static sites and movements of expatriate personnel and 21 sensitive materials."</p> <p>22 Is that something you understood and recognised?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. Turn, please, to page 94. Under the heading, the first 25 number 1, "Security management", the second paragraph:</p> <p style="text-align: center;">Page 21</p>	<p>1 to the Larache VCP in the south. Originally, this was 2 uniquely for the protection of the project expatriate 3 staff but more recently the military have received 4 orders to extend this to the protection of all personnel 5 as well as the project assets."</p> <p>6 Do you know the two locations that are mentioned in 7 that paragraph?</p> <p>8 <b>A. Yes, Ohanet was the termination point for our export 9 lines. We had three export pipelines that left the 10 plant. And Ohanet was the termination where we tied 11 into the Sonatrach main transmission system. I don't 12 recognise Larache but I assume that's probably La 13 Recule, would be La Recule.</b></p> <p>14 Q. Do you know the distances between them?</p> <p>15 <b>A. Ah --</b></p> <p>16 Q. Rather than trying to ask you to do it that way, let me 17 just try and suggest something and see if it sounds 18 about right to you. From the CPF to Ohanet is about 92 19 kilometres?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. And from the CPF to Larache is about 69 kilometres?</p> <p>22 <b>A. That is roughly right, yes.</b></p> <p>23 Q. Were you aware that there were Gendarme camps at those 24 two points as well?</p> <p>25 <b>A. I was not aware of a Gendarme camp in Ohanet but there</b></p> <p style="text-align: center;">Page 23</p>
<p>1 "The security management of [In Amenas] is 2 accordingly split into two categories.</p> <p>3 "The mandatory protection of the project by the 4 Algerian forces.</p> <p>5 "The project's internal security."</p> <p>6 Again, something you understood and consistent with 7 the graphic we have looked at?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. Then turn, please, over the page and the heading 10 "Military protection". You see here that:</p> <p>11 "The project area comes under the command of the 12 fourth military region and under the administration of 13 the Wilaya of Illizi."</p> <p>14 That is consistent with what you have already 15 explained?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. And:</p> <p>18 "The military authorities have provided a brigade of 19 Gendarmes to secure the IA zone."</p> <p>20 The Brigade of Gendarmes refers to the Gendarmes 21 again that we have been talking about, does it?</p> <p>22 <b>A. That's correct, the garrison on site.</b></p> <p>23 Q. But it goes beyond that, doesn't it because it says:</p> <p>24 "The military authorities have provided a Brigade of 25 Gendarmes to secure the IA zone from Ohanet in the north</p> <p style="text-align: center;">Page 22</p>	<p>1 <b>could have been one there.</b></p> <p>2 Q. But the zone that they protected as described in this 3 document extended over that distance with however many 4 Gendarmes in however many camps across that region?</p> <p>5 <b>A. Yes, correct.</b></p> <p>6 Q. And what did you understand their role to be as 7 providing military protection?</p> <p>8 <b>A. Well, I think their role was lined out in this document, 9 it is very clear, they were there for the protection of 10 all personnel, expat and national, protection of the 11 facilities and to provide safe passage for the movement 12 of personnel to and from the field facilities and to the 13 main town of In Amenas or in some cases up to Ohanet 14 where we would have to go up to do inspections and 15 maintenance work at our termination point at the export 16 pipelines.</b></p> <p>17 Q. You were taken to a document in the core bundle which is 18 behind divider 22 yesterday. It is a zone patrols 19 document. You may have been taken it to the day before, 20 Mr Cobb. Just putting this document into context, is 21 this a document that you had seen before or one that you 22 would have been familiar with?</p> <p>23 <b>A. This may have been the document that was part of the 24 weekly meeting, the liaison weekly meeting document that 25 I saw during my tenure as operations manager. I'm not</b></p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 <b>sure. It looks somewhat familiar but I don't</b>  2 <b>specifically remember it.</b>  3 Q. So it's no secret, you see at the top left there are  4 some words in red. We'll come to look at this with the  5 witness who is identified there, Mr Martin, who was one  6 of the liaison team people. Is that right?  7 <b>A. Yes, on one of the rigs.</b>  8 Q. This provides details of zone patrols and zone patrol  9 procedures as they were, at least, understood by  10 Mr Martin, presumably, at the time of the document.  11 Did you understand that the zones where free  12 movement was permitted would be the only zones that  13 would be patrolled by the Gendarmes?  14 <b>A. My understanding was that the primary zones patrolled</b>  15 <b>were the zones that were declared free movement zones.</b>  16 <b>But that didn't preclude in my mind that the Gendarmes</b>  17 <b>also did additional patrols to satisfy themselves that</b>  18 <b>they were able to carry out their basic mission which</b>  19 <b>was the protection of the people and the assets.</b>  20 Q. The free movement zones however permitted people and  21 particularly expats to move freely within those zones at  22 the appropriate times without needing an escort?  23 <b>A. That's correct.</b>  24 Q. But if you went outside the free movement zone an escort  25 had to be provided?</p> <p style="text-align: center;">Page 25</p>	<p>1 at. Then a description of the tasks the military  2 perform. I don't go through at the moment, zone  3 protection, site protection, escorts, and then two  4 paragraphs up from the bottom of that section it says:  5 "This system is effective and acts as a deterrent."  6 We will look at this again. But below that it says:  7 "The number of military on each location is dictated  8 by their respective military command and is in line with  9 the perceived threat level within the area. Present  10 numbers of military on the different project locations  11 are shown in appendix B."  12 The military here is a reference to the Gendarme?  13 <b>A. In this case, yes.</b>  14 Q. "Dictated by their respective military command and in  15 line with perceived threat level within the area.  16 Present numbers shown in appendix B".  17 Appendix B if you turn over to page 98, and under  18 the plan we see set out appendix B:  19 "Project locations, permanent personnel effectives".  20 Lots of detail here and as we have the document open  21 at this point it might just be as easy to look at some  22 of these entries. In the first box:  23 "Summary of permanent liaison effectives at all  24 locations."  25 We see OLS and OLC, who are the Operations Liaison</p> <p style="text-align: center;">Page 27</p>
<p>1 <b>A. If it was an expat, yes.</b>  2 Q. If they were just patrolling the free movement zone and  3 nowhere else would that mean that they would be going  4 between the CPF and the BdV and out to the Manifold 5 up  5 to about 6 o'clock, but that would be it?  6 <b>A. I'm sorry, repeat that question again?</b>  7 Q. If the Gendarmes were only patrolling the free movement  8 zone, which has been looked at with you going through  9 this document, would that mean they would just be  10 patrolling up and down from the CPF to the BdV and out  11 to Manifold 5?  12 <b>A. I believe yesterday I testified and tried to circle an</b>  13 <b>area with my hand to show that it was generally the area</b>  14 <b>round the CPF, not just directly in between, there was</b>  15 <b>a lot of real estate, a lot of desert out to the side of</b>  16 <b>that, so it would have been from the CPF back behind the</b>  17 <b>CPF where the export pipelines went into the dune line,</b>  18 <b>from that point all the way back down to Manifold 5, out</b>  19 <b>to the edge of the falaise and the desert going out to</b>  20 <b>Manifold 5. So it was not a huge area but a larger area</b>  21 <b>than just a road going in between the CPF and the BdV.</b>  22 Q. You were asked about numbers of Gendarmes and again, if  23 we look, please, at the security management plan behind  24 divider 11, page 95, please, under the heading "Military  25 protection" again we have the paragraphs we have looked</p> <p style="text-align: center;">Page 26</p>	<p>1 Supervisor and the Operations Liaison Coordinator, is  2 that right?  3 <b>A. That's correct.</b>  4 Q. So liaison again and there are two of those at the BdV.  5 One at Enafor if you run your eye across to the right  6 and one at KCAD which is a T212 rig?  7 <b>A. Correct.</b>  8 Q. Then there are numbers of drivers, head drivers and  9 drivers, radio ops people and then military. We see  10 under the heading "BdV" 160 military there?  11 <b>A. That's correct.</b>  12 Q. Carry on over to the right, 30 more at Enafor and 30  13 more at T212?  14 <b>A. That's correct.</b>  15 Q. And again, so as to save coming back to this part of  16 this document, below it we have another table which just  17 helps with some other numbers. ASI is the person or the  18 post which was created after the transfer to SSI; is  19 that right?  20 <b>A. That's correct, that would have been the head person,</b>  21 <b>the responsible person for all of the employees within</b>  22 <b>that organisation.</b>  23 Q. And we'll look at his role in a moment. But there would  24 be one of those. In fact, there were two, is that  25 right?</p> <p style="text-align: center;">Page 28</p>

<p>1 <b>A. No.</b></p> <p>2 Q. Back-to-back?</p> <p>3 <b>A. AS -- I believe there was only one ASI.</b></p> <p>4 Q. Not to worry. One ASI and then I think we can for the</p> <p>5 moment ignore the others. Then guards, we have numbers</p> <p>6 of guards at different parts of the different locations,</p> <p>7 10 at the BdV, 9 at the CPF, 8 at the VCP and so on and</p> <p>8 it can all be read by anyone who wants to read it.</p> <p>9 But this is information contained in the security</p> <p>10 management plan provided by the liaison team to the JV?</p> <p>11 <b>A. That's correct.</b></p> <p>12 Q. And within the facilities at In Amenas, the mobile rigs</p> <p>13 and the camp itself we have a total of what in fact</p> <p>14 amounts to 220 Gendarmes split across those locations?</p> <p>15 <b>A. 220 from the CPF, the BdV and the two rig sites within</b></p> <p>16 <b>the field.</b></p> <p>17 Q. So far as vehicles are concerned, can we just be clear</p> <p>18 about this. The Gendarmes had their own vehicles,</p> <p>19 didn't they?</p> <p>20 <b>A. The Gendarmes had vehicles, yes, that's correct.</b></p> <p>21 Q. Were they identifiable as Gendarme vehicles?</p> <p>22 <b>A. Absolutely.</b></p> <p>23 Q. How were they identifiable?</p> <p>24 <b>A. Very distinctive green colour as well as some of them</b></p> <p>25 <b>had flashing lights on the top.</b></p> <p style="text-align: center;">Page 29</p>	<p>1 <b>a driving permit that allowed them to drive our company</b></p> <p>2 <b>vehicles. This is our staff I'm speaking of.</b></p> <p>3 Q. And when expats were escorted off the site as you have</p> <p>4 described they would be, would the Gendarmes travel in</p> <p>5 the vehicles supplied by the JV with the JV drivers</p> <p>6 driving those vehicles?</p> <p>7 <b>A. That's correct.</b></p> <p>8 Q. Did you understand that the Gendarmes would use those</p> <p>9 vehicles and the JV drivers to carry out their patrols</p> <p>10 within whichever zones they were patrolling?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. Would they also use their own vehicles with their own</p> <p>13 Gendarmes to carry out those patrols?</p> <p>14 <b>A. I saw, what I can say is I saw those green Gendarme</b></p> <p>15 <b>vehicles moving all over the field at different times.</b></p> <p>16 Q. And when they were not being used do you know where the</p> <p>17 Gendarme vehicles would be parked?</p> <p>18 <b>A. In their Gendarmerie.</b></p> <p>19 Q. Did the JV in any shape or form have knowledge of or</p> <p>20 control over the use of those vehicles, the Gendarme</p> <p>21 vehicles?</p> <p>22 <b>A. No, none whatsoever.</b></p> <p>23 Q. You were asked about knowledge of the ability to conduct</p> <p>24 patrols during the strike. In summary did I understand</p> <p>25 your evidence to be as far as you understood it the</p> <p style="text-align: center;">Page 31</p>
<p>1 Q. Would they be driven by Gendarmes?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. It may seem a foolish question, Mr Cobb, but presumably</p> <p>4 rather like police cars somebody else can't just jump in</p> <p>5 and start driving that sort of vehicle around?</p> <p>6 <b>A. Yes, certainly our personnel, our drivers were not</b></p> <p>7 <b>allowed to drive a military vehicle, nor was the</b></p> <p>8 <b>military, as Captain Hocine explained to me, allowed to</b></p> <p>9 <b>have his soldiers drive our vehicles.</b></p> <p>10 Q. So far as your vehicles were concerned, were they also</p> <p>11 identifiable as JV vehicles?</p> <p>12 <b>A. Yes, they were all a similar colour and they had</b></p> <p>13 <b>stickers on the side that said "IA -- I believe they</b></p> <p>14 <b>said "IAP". In Amenas Project is what it stood for.</b></p> <p>15 Q. And those vehicles were provided by the JV with drivers?</p> <p>16 <b>A. With drivers, that's correct.</b></p> <p>17 Q. Again, there is much in the paperwork which explains how</p> <p>18 there was a concern about the quality of driving in the</p> <p>19 region and your drivers had to be trained to drive at</p> <p>20 a particular level with particular skills?</p> <p>21 <b>A. Yes, our drivers, all of them had to go through an off</b></p> <p>22 <b>road driving course as well as attend a normal driving</b></p> <p>23 <b>course and pass a test and get -- licence is the wrong</b></p> <p>24 <b>word to use because we couldn't officially issue</b></p> <p>25 <b>a licence in the country but what we issued was</b></p> <p style="text-align: center;">Page 30</p>	<p>1 patrols could continue to be carried out by the</p> <p>2 Gendarmes as they thought appropriate notwithstanding</p> <p>3 the drivers strike?</p> <p>4 <b>A. Yes, the strike was aimed at trying to cripple the</b></p> <p>5 <b>ability to move expats around the field, so hence what</b></p> <p>6 <b>they did was they would restrict the movement by not</b></p> <p>7 <b>agreeing to do the escorts, whether that was to</b></p> <p>8 <b>a drilling rig, whether that was to a well site, whether</b></p> <p>9 <b>that was going to and from the airport, and all of those</b></p> <p>10 <b>required an escort.</b></p> <p>11 Q. There was a communication at the time of the strike from</p> <p>12 Mr Bech to different people explaining the potential</p> <p>13 implications of the strike and what needed to be done.</p> <p>14 We can look at that in core bundle 1.</p> <p>15 THE CORONER: Sorry, can I just ask, when you say that the</p> <p>16 purpose of the strikes was that they would restrict</p> <p>17 movement by not agreeing to doing the escorts -- yes,</p> <p>18 that is what you said.</p> <p>19 <b>A. Yes.</b></p> <p>20 THE CORONER: You mean by refusing to drive vehicles that</p> <p>21 would have Gendarme in them which would provide -- what</p> <p>22 do you mean, that the drivers would refuse to do the</p> <p>23 escorts? What escorting were the drivers doing?</p> <p>24 <b>A. The drivers refused to do all escort duties aside from</b></p> <p>25 <b>two trips a week to the airport.</b></p> <p style="text-align: center;">Page 32</p>

8 (Pages 29 to 32)

<p>1 THE CORONER: What do you mean by escort duty?</p> <p>2 <b>A. In other words, driving the vehicle with the military in</b></p> <p>3 <b>it to allow the movement of expat staff.</b></p> <p>4 THE CORONER: I thought that was what you meant but I just</p> <p>5 wanted to understand.</p> <p>6 MR POPAT: All those vehicles which would be driven out to</p> <p>7 do the escort duties were, certainly at that time, being</p> <p>8 driven by the JV drivers?</p> <p>9 <b>A. That's correct.</b></p> <p>10 Q. Again, this may have been dealt with fairly quickly</p> <p>11 yesterday, but the strike itself, Mr Cobb, that related</p> <p>12 to the drivers and the guards at a different point,</p> <p>13 concerns about their employment contracts with Sonatrach</p> <p>14 effectively?</p> <p>15 <b>A. Fundamentally their demand was they wanted to become</b></p> <p>16 <b>permanent employees of Sonatrach. They felt they were</b></p> <p>17 <b>disadvantaged and that they should be given the same</b></p> <p>18 <b>opportunities to be a permanent employee of Sonatrach as</b></p> <p>19 <b>the full-time Sonatrach employees. However, it is worth</b></p> <p>20 <b>saying that Sonatrach over the years had hired less of</b></p> <p>21 <b>crafts such as drivers, guards, these type of</b></p> <p>22 <b>individuals and focused on their employment efforts</b></p> <p>23 <b>around their professional and technical staff.</b></p> <p>24 Q. Behind divider 14 in the core bundle we should have an</p> <p>25 email from the IAMGT ops manager. Does that mean the</p> <p style="text-align: center;">Page 33</p>	<p>1 Q. It is right there should be reference to the next</p> <p>2 paragraph:</p> <p>3 "Based on the above status we have today decided to</p> <p>4 reduce the number of expats..."</p> <p>5 There is details of that:</p> <p>6 "We will try to maintain this activity level for</p> <p>7 IACP JGC as their expats live in a separate camp with</p> <p>8 their own guards/drivers. Any future demob of this team</p> <p>9 will be supported by an escort driven by the Gendarmes.</p> <p>10 18 expats will remain from JGC and 9 expats from IA</p> <p>11 operations."</p> <p>12 Again, putting to one side all the various acronyms,</p> <p>13 Mr Cobb, there would be people who would need to be</p> <p>14 moved around and they would be moved around with the</p> <p>15 requisite escort which would continue to be provided but</p> <p>16 this time in vehicles driven by the Gendarmes?</p> <p>17 <b>A. Well, in the case of a demob is what this specifically</b></p> <p>18 <b>refers to, and that ties back into the conversation we</b></p> <p>19 <b>had around my meeting with Captain Hocine and the</b></p> <p>20 <b>concern that the drivers did pull all service, could the</b></p> <p>21 <b>military, the Gendarmes, support us and provide escorts</b></p> <p>22 <b>to move the rest of the people off-site because both</b></p> <p>23 <b>Tore and I had the same concern, we didn't want to have</b></p> <p>24 <b>anyone trapped on the site.</b></p> <p>25 Q. We will look at this document in relation to matters</p> <p style="text-align: center;">Page 35</p>
<p>1 operations manager?</p> <p>2 <b>A. Yes, operations manager.</b></p> <p>3 Q. Who was Mr Bech?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. Addressed to Mr Sneberg, Mr Collins and to you and</p> <p>6 copied to Mr Benadouda and dealing with the IA strike,</p> <p>7 development/demob of nonessential experts. Again, I am</p> <p>8 afraid we will need to come back to this document for</p> <p>9 another purpose, but for present purposes if we just</p> <p>10 pick up the heading "Consequences of this development",</p> <p>11 Mr Bech says:</p> <p>12 "Most likely we will be without drivers by the end</p> <p>13 of the month. No contract, no driving."</p> <p>14 This was September 2012, towards the end</p> <p>15 of September 2012:</p> <p>16 "By the end of the month we will be without drivers.</p> <p>17 This will have an effect on escorts, ambulances,</p> <p>18 transport of exploitation to/from CPF ... there will</p> <p>19 furthermore not be any more minimum service from the</p> <p>20 strikers as they are without contract".</p> <p>21 Was there any indication given to you by Mr Bech or</p> <p>22 indeed anyone else that the problems caused by the</p> <p>23 strike would lead to inability of the Gendarmerie to</p> <p>24 provide the protection they were there to provide?</p> <p>25 <b>A. No.</b></p> <p style="text-align: center;">Page 34</p>	<p>1 concerning the strike just shortly, but now we can move</p> <p>2 on from it.</p> <p>3 Just a few questions about your understanding of the</p> <p>4 weaponry possessed and held by the Gendarmes and the</p> <p>5 rapid action deployment force.</p> <p>6 <b>A. Okay.</b></p> <p>7 Q. What did you understand, if anything, the Gendarmes to</p> <p>8 possess in terms of equipment and weaponry?</p> <p>9 <b>A. Well, I didn't have direct knowledge in the sense that</b></p> <p>10 <b>I didn't physically see it and go inside their armory,</b></p> <p>11 <b>but I had asked the questions of Hocine who had a lot of</b></p> <p>12 <b>dealings, almost a day-to-day basis, with the military,</b></p> <p>13 <b>he was my logistics manager and in a conversation one</b></p> <p>14 <b>day I remember asking him about what kind of weapons,</b></p> <p>15 <b>aside from AK47s, did the Gendarmes have and what he</b></p> <p>16 <b>alluded to me was they had a well stocked armory that</b></p> <p>17 <b>had other heavy artillery in it and by that I took him</b></p> <p>18 <b>to mean that they probably had RPGs, they probably had</b></p> <p>19 <b>some heavy machineguns and that type of thing. So it</b></p> <p>20 <b>wasn't just pistols and AK47s with the soldiers but</b></p> <p>21 <b>no one was allowed into that armory, certainly no expat.</b></p> <p>22 Q. The rapid action deployment force, explain how you came</p> <p>23 to be aware of its existence or understand of its</p> <p>24 existence. Was that the only response you would expect</p> <p>25 in the event of an emergency or an attack from the</p> <p style="text-align: center;">Page 36</p>

<p>1 Gendarmes?</p> <p>2 <b>A. Oh, absolutely not.</b></p> <p>3 Q. Was there any facility so far as you understood it for</p> <p>4 communication between the Gendarmes all across the</p> <p>5 locations that they were present in, either patrolling</p> <p>6 or stationed in a particular location?</p> <p>7 <b>A. Yes, we shared a radio network.</b></p> <p>8 Q. And that extended out to the Gendarmes at the VCP at</p> <p>9 La Recule?</p> <p>10 <b>A. I believe it would go that far.</b></p> <p>11 Q. Was there any change in the activity of the Gendarmes in</p> <p>12 the weeks leading up to the attack so far as you could</p> <p>13 discern?</p> <p>14 <b>A. Nothing -- no change that I could discern.</b></p> <p>15 Q. Can we try and look at the processes and the security</p> <p>16 measures that would be seen or experienced by somebody</p> <p>17 coming into In Amenas from another country, an expat</p> <p>18 working at In Amenas who's coming in from outside</p> <p>19 Algeria.</p> <p>20 <b>A. Okay.</b></p> <p>21 Q. First, so far as the ability of people to come to</p> <p>22 In Amenas, was it possible for them to come as and when</p> <p>23 they wanted from their countries into In Amenas or were</p> <p>24 there requirements for obtaining permissions from</p> <p>25 country heads for them to be allowed to visit In Amenas?</p> <p style="text-align: center;">Page 37</p>	<p>1 <b>people as they came in country.</b></p> <p>2 Q. So visitors, BP employees coming out to work at</p> <p>3 In Amenas would have to in the first instance obtain an</p> <p>4 approval from the country head and then on a regular</p> <p>5 basis would be permitted to come to In Amenas but</p> <p>6 subject to JOC approval?</p> <p>7 <b>A. Well, if they were a regular rotator, yes, from that</b></p> <p>8 <b>point they would continue to come in without any further</b></p> <p>9 <b>permission required as long as they were a permanent</b></p> <p>10 <b>member of the staff on site.</b></p> <p>11 Q. And would they receive an induction back in England if</p> <p>12 they're a BP employee coming over and then again an</p> <p>13 induction at some point in Algeria?</p> <p>14 <b>A. I can say that they for sure received one when they came</b></p> <p>15 <b>into Algeria. As far as did they receive one outside</b></p> <p>16 <b>the country, I can't really say because I had been in</b></p> <p>17 <b>the country so long I didn't actually go through that</b></p> <p>18 <b>process myself. I'd already been there and been bedded</b></p> <p>19 <b>into the system so I didn't have to go back through it</b></p> <p>20 <b>once BP actually acquired Atlantic Richfield, which was</b></p> <p>21 <b>the original company I worked for.</b></p> <p>22 Q. I don't want to make reference to another document or</p> <p>23 require you to look it up, Mr Cobb, but you looked at</p> <p>24 this the other day. There was the induction slides</p> <p>25 which were a PowerPoint presentation behind divider 10</p> <p style="text-align: center;">Page 39</p>
<p>1 <b>A. Yes, that's correct.</b></p> <p>2 Q. I gave you two options and you said "yes, that's</p> <p>3 correct" which of the two was it?</p> <p>4 <b>A. They were required to go through a procedure. No one</b></p> <p>5 <b>could just show up at the site. You couldn't book a</b></p> <p>6 <b>flight at a commercial airline up and show up in a car</b></p> <p>7 <b>at the front gate. The transportation through the</b></p> <p>8 <b>charter operation, Jet Air, which flew from Gatwick into</b></p> <p>9 <b>Hassi Messaoud, was tightly controlled for all the JV</b></p> <p>10 <b>employees and then -- more particularly on your first</b></p> <p>11 <b>visit you had to have permission from the country head</b></p> <p>12 <b>to be able to come in.</b></p> <p>13 Q. Just pause there. The country head there, is that the</p> <p>14 country head of the, in this case the two nonnational</p> <p>15 organisations who are part of the JV?</p> <p>16 <b>A. Well, it depended upon who the employee worked for. If</b></p> <p>17 <b>there was a new BP employee coming to site it would</b></p> <p>18 <b>require Andy Collins's approval for that first time to</b></p> <p>19 <b>the site. After that if they were a regular rotator it</b></p> <p>20 <b>would no longer need that approval. So it was</b></p> <p>21 <b>a screening process up-front.</b></p> <p>22 <b>If it was contractors that was a different level of</b></p> <p>23 <b>approval and that could actually happen at the JLC level</b></p> <p>24 <b>and I assume, I'm not positive, that Statoil probably</b></p> <p>25 <b>had something similar in their own system for their</b></p> <p style="text-align: center;">Page 38</p>	<p>1 in the core bundle and it had a list of things which you</p> <p>2 said the person carrying out the induction would relay</p> <p>3 to the inductee?</p> <p>4 <b>A. That's correct.</b></p> <p>5 Q. And that included, did it not, how liaison with security</p> <p>6 forces was to be carried out, the security overview, the</p> <p>7 military operational areas and so on?</p> <p>8 <b>A. Yes, and that also included myself, even though with</b></p> <p>9 <b>what I just said I didn't go through the external BP</b></p> <p>10 <b>process, if it existed. When I transferred from Rhoude</b></p> <p>11 <b>de Baguel and came to In Amenas that was the first thing</b></p> <p>12 <b>I did was my security induction when I got to the site.</b></p> <p>13 Q. And included instructions on what to do in the event of</p> <p>14 a security alarm, the intermittent siren which included</p> <p>15 to lock doors and stay in the particular rooms --</p> <p>16 <b>A. That's correct, the exact one that we spoke about</b></p> <p>17 <b>yesterday.</b></p> <p>18 Q. And that was provided by the liaison function again, was</p> <p>19 it?</p> <p>20 <b>A. Yes, that was the OLC position that would give the</b></p> <p>21 <b>security induction when you arrived at site.</b></p> <p>22 Q. In addition to that, were passes required to be obtained</p> <p>23 by expats coming into the country, permissions?</p> <p>24 <b>A. Permissions?</b></p> <p>25 Q. Yes?</p> <p style="text-align: center;">Page 40</p>

<p>1 <b>A. Yes, you had to have visas. You had to have a desert</b>  2 <b>pass.</b>  3 Q. A desert pass is the same as the pass we have talked  4 about?  5 <b>A. Laissez Passer, yes.</b>  6 Q. And that required, again, checks to be conducted by the  7 Algerian authorities on the suitability of a person to  8 be able to come into the country?  9 <b>A. Yes, I'm not sure exactly how they did the background</b>  10 <b>check for the desert pass, but there was some process</b>  11 <b>they went through.</b>  12 Q. And then when at In Amenas expats were subject to  13 curfews?  14 <b>A. That's correct.</b>  15 Q. And again, just help us with timings of that?  16 <b>A. You know, the curfew was roughly, I believe it was about</b>  17 <b>7 o'clock, 7.30 at night and you couldn't leave back out</b>  18 <b>of the camp the following morning until the 5.30, 5.45</b>  19 <b>kind of timeframe was the earliest that you could leave</b>  20 <b>the camp.</b>  21 Q. The camp itself, we have seen the maps and seen roughly  22 where it is. It is I think 70 kilometres or so from the  23 Libyan border and a further distance from the Mali  24 border located in the Sahara. How far is it from  25 In Amenas town?</p> <p style="text-align: center;">Page 41</p>	<p>1 country would require them to travel to Hassi Messaoud  2 first?  3 <b>A. Generally that's correct.</b>  4 Q. And then there would be a process that would be carried  5 out there where they would be checked and taken to  6 another flight where they would be transported to  7 In Amenas, is that right?  8 <b>A. Yes, they would be met by a liaison person from</b>  9 <b>Hassi Messaoud who was waiting just outside the door of</b>  10 <b>the arrivals hall where the charter passengers were</b>  11 <b>processed through. He would then verify everybody's</b>  12 <b>name on a manifest that was maintained, a current record</b>  13 <b>of everyone's movements. And then they would be -- for</b>  14 <b>the new people coming in he might escort them down to</b>  15 <b>the departure hall where we had left on our infield</b>  16 <b>flights. For someone who had experience coming and</b>  17 <b>going to the site they would simply walk down the curb,</b>  18 <b>I mean it was maybe 50-yards down the road and you just</b>  19 <b>went in another entry. It was all part of the same</b>  20 <b>secure airport facility but you would just walk down the</b>  21 <b>road and go in a different entryway.</b>  22 Q. And then fly into In Amenas?  23 <b>A. Then you would fly into In Amenas town on a Beech 1900.</b>  24 Q. And at In Amenas there would be an escort, they would be  25 met by liaison and military personnel to be escorted --</p> <p style="text-align: center;">Page 43</p>
<p>1 <b>A. It's probably about plus or minus 40-miles, roughly by</b>  2 <b>road.</b>  3 Q. And just give us a sense of the environment, the sound,  4 the visibility, the lightness, the darkness in  5 about January 2013. Was it very noisy around the camp?  6 <b>A. Generally speaking?</b>  7 Q. Yes.  8 <b>A. I think you're going to have to be a little bit more</b>  9 <b>specific on that question.</b>  10 Q. If we are talking about being in the BdV is that an  11 environment which is filled with noise at all times of  12 day?  13 <b>A. No, generally it's not an extremely noisy place. There</b>  14 <b>are times it could be a little bit noisy. There are</b>  15 <b>certain areas that could be a little bit noisy but</b>  16 <b>generally the camp was not a noisy environment as</b>  17 <b>compared to the plant.</b>  18 Q. Exactly. So as compared to the CPF which was presumably  19 much noisier?  20 <b>A. It is a live plant, so, yes.</b>  21 Q. Again, this may be clear to everyone but at  22 approximately 5 o'clock in the morning in January it  23 could be very dark?  24 <b>A. Yes, it was very dark.</b>  25 Q. Process on arrival for any expats coming into the</p> <p style="text-align: center;">Page 42</p>	<p>1 <b>A. Yes, you would normally --</b>  2 Q. -- to In Amenas?  3 <b>A. You would normally be met by the liaison assistant. We</b>  4 <b>talked about S yesterday. S was one of the liaison</b>  5 <b>assistants. Sometimes there would be an OLS or OLC</b>  6 <b>there. If it happened to be such that there was a group</b>  7 <b>that came in and went into town to do fingerprinting,</b>  8 <b>because sometimes we had to go do our fingerprinting in</b>  9 <b>town in order to get our visas. So sometimes the OLC or</b>  10 <b>the OLS would accompany the group in there and then a</b>  11 <b>further group would split off and go to the airport,</b>  12 <b>those people who were recruit changing, and they would</b>  13 <b>come back by and pick up the people from the police</b>  14 <b>station.</b>  15 Q. Then the approach from In Amenas airport into the  16 facility would require, certainly if they chose to, the  17 people making that journey to travel along the main  18 highway and come up to the approach to In Amenas up to  19 La Recule, the vehicle checkpoint there?  20 <b>A. Yes, that's correct.</b>  21 Q. Did I understand your evidence, when you started giving  22 your evidence, to be correct, that there were many parts  23 of the desert where people could drive across it and if  24 they chose to go off road there were areas where they  25 could carry on driving off road?</p> <p style="text-align: center;">Page 44</p>

<p>1 <b>A. There were certain areas that you could drive off road,</b>  2 <b>yes.</b>  3 Q. Those would all be areas still within the military zone  4 that we looked at but it would be physically possible  5 for somebody to come off road and drive through the  6 desert?  7 <b>A. Yes, that's true.</b>  8 Q. Absent building some sort of set of barriers and fences  9 and gates and whatever else from that approach is there  10 anything else that could physically stop people driving  11 across the desert if that's what they chose to do?  12 <b>A. Not that I'm aware of.</b>  13 Q. As they approached the VCP at La Recule just give us  14 again an idea of the surrounding. There is desert all  15 around the checkpoint?  16 <b>A. That's correct.</b>  17 Q. Is visibility clear and good in all directions from the  18 checkpoint?  19 <b>A. I would say yes, the military actually had a barracks</b>  20 <b>building that was on the corner of the road as you</b>  21 <b>turned right to go to the facility. There was</b>  22 <b>a guardhouse that they would keep a soldier in at times.</b>  23 <b>Across on the other side of the road there was a set of</b>  24 <b>chicanes as you approached it. A set of chicanes as you</b>  25 <b>turned the corner going by the guardhouse for the</b></p> <p style="text-align: center;">Page 45</p>	<p>1 <b>you sometimes see that are to stop a vehicle at a high</b>  2 <b>rate of speed. So there was a combination of the two of</b>  3 <b>them.</b>  4 Q. And that checkpoint manned by Gendarmes 24 hours a day?  5 <b>A. Yes.</b>  6 Q. Beyond that checkpoint, assuming again the person  7 travelling is travelling on the road, they would  8 approach the point at the VCP1 checkpoint, as we have  9 called it?  10 <b>A. Yes, VCP1 would be the next checkpoint you came to.</b>  11 Q. You can look at it perhaps -- I have lost my large  12 photographs -- in the approach to VCP1 if you have the  13 large photographs which have exhibit IA/026 at the top,  14 Mr Cobb?  15 <b>A. Yes, IA/026.</b>  16 Q. The approach from La Recule would take the driver along  17 the road up to VCP1 where there would be another  18 checkpoint manned by a guard?  19 <b>A. Yes.</b>  20 Q. That checkpoint again had ahead of it a chicane?  21 <b>A. I don't remember a chicane there, no.</b>  22 Q. A drop arm barrier?  23 <b>A. Yes.</b>  24 Q. And manned 24 hours a day?  25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 47</p>
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<p>1 <b>military post, the Gendarme post.</b>  2 Q. And then at the checkpoint at La Recule you explained  3 there were Gendarmes, who else would be present at the  4 checkpoint?  5 <b>A. That particular checkpoint was Gendarmes.</b>  6 Q. Would there be people from any other government  7 organisations based there as well?  8 <b>A. Not that I'm aware of.</b>  9 Q. The distance from that checkpoint to the camp was about  10 10 kilometres?  11 <b>A. Yes, I would have said roughly 6 or 7-miles, yes.</b>  12 Q. And if there was a mode of communication from that  13 checkpoint back to the Gendarmes' camp does it follow  14 that there would be the ability to give a warning which  15 would be in the region of up to I suppose ten minutes of  16 warning time assuming a vehicle travelling that distance  17 from the checkpoint?  18 <b>A. Oh absolutely.</b>  19 Q. The approach to the VCP at La Recule, was there  20 a chicane on that approach?  21 <b>A. Yes, as you came from In Amenas town to La Recule there</b>  22 <b>was a chicane. If memory serves me correct there was</b>  23 <b>concrete T bars that we have talked about earlier and</b>  24 <b>there was also some, I wouldn't even know -- kind of</b>  25 <b>metal barriers with multi-legs coming off of them that</b></p> <p style="text-align: center;">Page 46</p>	<p>1 Q. A procedure to be followed by the guards there?  2 <b>A. Stop all vehicles, verify that the vehicle had</b>  3 <b>legitimate business with In Amenas, do an inspection, if</b>  4 <b>it was a vehicle like a box type vehicle, or whoever</b>  5 <b>they would inspect it for what it was carrying and if</b>  6 <b>there was any concerns about the physical condition of</b>  7 <b>that vehicle then typically one of our land transport</b>  8 <b>people was called up to the VCP1 where they then did</b>  9 <b>a thorough inspection of the vehicle and decision made</b>  10 <b>as to whether it would be allowed further on into our</b>  11 <b>facilities or stopped there and discharged in that large</b>  12 <b>parking lot.</b>  13 Q. The person travelling then would go past VCP1 if they  14 continued along the road and then come up to towards the  15 camp. If they were turning into the BdV they would come  16 in off the road at the top of the photograph on page 5;  17 is that right?  18 <b>A. That's correct.</b>  19 Q. So this is the road into the BdV after passing VCP1,  20 coming into the --  21 THE CORONER: So this is helpful to me. So this is showing  22 us, can you just repeat us what you said?  23 MR POPAT: This is the road off the main road after VCP1  24 into the BdV.  25 <b>A. That's correct.</b></p> <p style="text-align: center;">Page 48</p>
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<p>1 Q. Can we just in fact -- sorry, it is in the other set of 2 photographs. If we just pick up NAS 23, Mr Cobb. This 3 may help with the coroner's question. 4 THE CORONER: If you can just say, I did have a copy. 5 MR POPAT: NAS 23, page 2. Just help us get our 6 orientation, Mr Cobb. Off to the right, off the 7 photograph from the road we see running at the top some 8 way off the photograph would be La Recule? 9 <b>A. That's correct, further up the road to the right.</b> 10 Q. Some few kilometres from the point of VCP1 which is what 11 we see towards the top of the photograph? 12 <b>A. That's correct.</b> 13 Q. So the vehicle, assuming a vehicle travelling on the 14 road, passes La Recule, comes along this road, travels 15 a few kilometres to get to VCP1 where there is the 16 guardhouse with a drop arm barrier? 17 <b>A. That's correct.</b> 18 Q. And then continues beyond VCP1 and we can see in fact an 19 image of, I think it is a bus travelling along that 20 route, continues along the road from right to left and 21 if then the driver wishes to go into the BdV, again 22 assuming travelling along the road, they would approach 23 the first turning we can see on the photograph and take 24 a left. There is a slightly sharp turn? 25 <b>A. Mmm.</b></p> <p style="text-align: center;">Page 49</p>	<p>1 <b>facility with you could physically remove those. Not</b> 2 <b>one person, they were very, very heavy, but they could</b> 3 <b>be removed to facilitate that and at all other times</b> 4 <b>they were left in place so that effectively was</b> 5 <b>a chicane.</b> 6 Q. They, having turned along that sharp left would come up 7 to the chicane and have to manoeuvre the vehicle around 8 the chicane in the way we can see. Is there a gate 9 anywhere before this point, Mr Cobb? 10 <b>A. An entry gate?</b> 11 Q. Yes. 12 <b>A. No.</b> 13 Q. They get towards the end of the chicane we can see in 14 the photograph on the right and get to point B as shown 15 on the plan. Is that right? 16 <b>A. That's correct.</b> 17 Q. And point B we can see the photograph there again. 18 There appears to be on the left some sort of guardhouse 19 or small building? 20 <b>A. That's correct, that was the guardhouse.</b> 21 Q. And then the gate itself which is, is it the sliding 22 manual gate you have mentioned? 23 <b>A. Yes, this is the big manual sliding gate.</b> 24 Q. Just dealing with a matter that was raised with you 25 yesterday, when that gate was kept open at certain very</p> <p style="text-align: center;">Page 51</p>
<p>1 Q. And they take a left and come down that access road into 2 the BdV? 3 <b>A. That's correct.</b> 4 Q. Then we can pick it up again at the photograph I was 5 looking at with you which is IA/026, page 5. What we 6 see at the top of the photograph there is the 7 effectively the bottom -- I am sorry, I was going back 8 to the little bundle I had started with which is IA/026. 9 THE CORONER: I will look at it on the screen. I will write 10 it on later, yes. 11 MR POPAT: If the driver comes off the road after VCP1, 12 takes that slightly sharp left coming down towards the 13 BdV they would come down the road, we can see at the top 14 of this photograph, yes? 15 <b>A. Yes.</b> 16 Q. And they would come to point A? 17 <b>A. That's correct.</b> 18 Q. Point A, as we can see in the image to the right, is -- 19 you tell us, is that the start of the chicane? 20 <b>A. Yes, as you can see there was T bars on either side of</b> 21 <b>it that forces all the traffic to be funnelled into the</b> 22 <b>chicanes. In the case the chicanes were steel pilings</b> 23 <b>that fit into a sleeve down into the ground, those were</b> 24 <b>all purpose built like that. Where if you had a very,</b> 25 <b>very large vehicle that you had to transit into the</b></p> <p style="text-align: center;">Page 50</p>	<p>1 busy times of the day you said it was impractical to 2 close it. Does that mean that there was a procession of 3 vehicles effectively travelling along this route that we 4 have just looked at going up from B to A and then out to 5 the road? 6 <b>A. Yes, there would have been a procession at those times</b> 7 <b>that I mentioned.</b> 8 Q. So whilst the gate is open there are a blockade of 9 vehicles along this path? 10 <b>A. Yes, that happened many, many times, you tried to the</b> 11 <b>pull into the facility at the wrong time, say lunchtime</b> 12 <b>coming back in, if you were coming from the plant, say,</b> 13 <b>it was 1 o'clock and there would be the procession of</b> 14 <b>vehicles coming out of the camp, everyone leaving from</b> 15 <b>lunch to go back to their workstations, so you would</b> 16 <b>have to stop before the chicane and wait for the</b> 17 <b>procession to come out before you could enter in through</b> 18 <b>the chicanes to come to the guardhouse.</b> 19 Q. Assuming the vehicle goes past the gate, past the 20 guardhouse and travels on -- 21 THE CORONER: This is very helpful but just tell me, so the 22 procession of vehicles coming out, do they have to 23 undergo any check on their way out? 24 <b>A. No, the vehicles that were outbound wouldn't go through</b> 25 <b>a check early in the morning but those were all people</b></p> <p style="text-align: center;">Page 52</p>

<p>1 <b>who were going to their work post and they were all</b>  2 <b>company vehicles, okay. Visitor vehicles you can see</b>  3 <b>from this photograph A in the top right, you see the</b>  4 <b>vehicles parked off to the left side of those T bars,</b>  5 <b>the red and white stripes, if a vehicle did not belong</b>  6 <b>to the facility, wasn't part of our normal fleet, then</b>  7 <b>those vehicles parked outside. Only the company</b>  8 <b>vehicles would park inside the inner parking lot.</b>  9 MR POPAT: So if we look at A on the map or the plan, it is  10 actually a photograph, but on the photograph just to the  11 right of A we see a sort of what looks like a car park.  12 <b>A. Yes.</b>  13 Q. With an entrance into it. Is that the way in for  14 non-company vehicles?  15 <b>A. That's correct.</b>  16 Q. And they would not be permitted to go beyond the gate?  17 <b>A. No, not unless they had a specific reason to go inside</b>  18 <b>and then there was a procedure that was followed, for</b>  19 <b>example, a catering truck, okay, is the best example</b>  20 <b>I can come up with because that was normal. You had to</b>  21 <b>bring your catering supplies in.</b>  22 Q. And they would undergo a procedure to get in which would  23 require various checks which we can see in the  24 procedures had to be carried out by the guards?  25 <b>A. Correct.</b></p> <p style="text-align: center;">Page 53</p>	<p>1 let's say we get to the point where we can see a block  2 with a square round it with the letter N, do you see  3 that, Mr Cobb?  4 <b>A. Yes.</b>  5 Q. So to get to?  6 THE CORONER: Which letter?  7 MR POPAT: N.  8 THE CORONER: I see, yes. Which is just --  9 MR POPAT: The first building.  10 THE CORONER: -- the first one after the car parks really.  11 MR POPAT: To get to that point is there another gate?  12 <b>A. Yes, there is another gate, an inner gate.</b>  13 Q. Just try and help us identify that gate. I don't think  14 it has a square round it or a letter. But if you take  15 the block marked N as your reference point, Mr Cobb?  16 <b>A. If you look directly above that block, go across the</b>  17 <b>bitumen road you will see what is a fence line. Can you</b>  18 <b>make that out, sir?</b>  19 Q. It might actually help as we are doing that to work out  20 what the fence lines are. We'll come back to the point  21 of the gate there in a moment. But all the way round  22 this shape is a set of dotted marks, do you see those,  23 Mr Cobb?  24 <b>A. Yes, I do.</b>  25 Q. The widest perimeter around --</p> <p style="text-align: center;">Page 55</p>
<p>1 Q. And they then get through the gate at point B and then  2 if they wanted to continue on if we just run our finger  3 down from B we see to the left as we look at the  4 photograph a large car park?  5 <b>A. That's correct, there was actually two car parks. There</b>  6 <b>was the one you can see to the left which was not</b>  7 <b>covered and then off to the right-hand side you can see</b>  8 <b>what looks like a building, the white roof, that was</b>  9 <b>actually covered parking and then off to the right-hand</b>  10 <b>side of that you can see some vehicles parked in an</b>  11 <b>area. That's where the liaison vehicles parked.</b>  12 Q. So to get to that point they have to go past the various  13 checks we have talked about and then they can turn off,  14 off to the right as we see it, into the big car park or  15 to the left if they're going to the other car park?  16 <b>A. That's correct.</b>  17 Q. And there are no other barriers between point B and  18 those car parks?  19 <b>A. Not between point B and the car parks, no.</b>  20 Q. If they wanted to carry on and get into the BdV they'd  21 move straight down the road from B, wouldn't they?  22 <b>A. Yes.</b>  23 Q. As they do that and they approach the entrance to the  24 BdV, by that -- sorry, I mean the living areas and the  25 areas which are marked by the different buildings below,</p> <p style="text-align: center;">Page 54</p>	<p>1 THE CORONER: Right at the extremities.  2 MR POPAT: Right at the extremities we see lots of dotted  3 points. What are they?  4 <b>A. Those are T bars.</b>  5 Q. Those are the concrete barriers which surround the whole  6 of this camp, well, sorry, surround the whole of the  7 camp insofar as we can see those dotted points, yes?  8 <b>A. Yes.</b>  9 Q. So all the way round the perimeter where we see those  10 dotted points we have the concrete barriers which are,  11 I think you may have described them, but they are  12 substantial concrete blocks which -- in fact, if you  13 turn over from photograph 5, page 6, and look just at  14 the photograph on the right, the top one on the right,  15 through the fence line, do we see the concrete barriers  16 which surround the perimeter?  17 <b>A. Yes, that's what you're looking at. Designed exactly as</b>  18 <b>the ones that we saw on the previous photo that are</b>  19 <b>painted white and red.</b>  20 Q. Clearly and obviously not enough of a gap between them  21 for any vehicle to pass through and they provide that  22 obstruction all the way round?  23 <b>A. That's exactly right.</b>  24 Q. Then if we carry on looking at this photograph, not easy  25 to make out, but there are lines which are going off</p> <p style="text-align: center;">Page 56</p>

14 (Pages 53 to 56)

<p>1 around the perimeter almost just at an angle. They are                  2 diagonal lines going off. What are they?                  3 <b>A. I'm not sure I'm following exactly.</b>                  4 Q. It is not easy, I'm sorry.                  5 THE CORONER: Those ones, like here.                  6 MR POPAT: Can you follow me there, Mr Cobb? (Indicated)                  7 <b>A. Yes.</b>                  8 Q. And then we go all the way along and they are all the                  9 way round just inside the perimeter where the concrete                  10 barriers are?                  11 <b>A. Yes, what you're seeing is the fence lines.</b>                  12 Q. No, I think we are referring to different things. We                  13 don't have a cursor or something else that I can point                  14 to. But there are small --                  15 THE CORONER: We might do. I have seen one coming on my                  16 screen. Just there, can you see it? It just                  17 disappeared, the cursor that is.                  18 MR POPAT: That's it, yes. If we take the top left-hand                  19 corner, Mr Cobb, looking at it on the screen where it                  20 has been blown up --                  21 <b>A. Okay.</b>                  22 Q. -- you see where the concrete barriers are?                  23 <b>A. Yes.</b>                  24 Q. From the top left-hand corner go along to the right and                  25 there is a little line which is seen on the photograph</p> <p style="text-align: center;">Page 57</p>	<p>1 <b>A. Yes.</b>                  2 Q. That is a fence that runs all the way along and topped                  3 with what?                  4 <b>A. The outer fence was topped with razor wire and the inner                  5 fence I believe was topped with barbed wire.</b>                  6 Q. Clear visibility through the fence for anyone needing to                  7 make observations of the surrounding area?                  8 <b>A. Yes.</b>                  9 Q. And then between that fence and the quarters, if we can                  10 call it that, is another fence?                  11 <b>A. Yes.</b>                  12 Q. And that again, I am afraid is not easy to see on the                  13 photograph at 5, but perhaps the best way of picking it                  14 up is if we look again at photograph 5, I am trying to                  15 find the best reference point, but if we look at the                  16 block marked "N" again, Mr Cobb?                  17 <b>A. Okay.</b>                  18 Q. From that point if you go upwards up towards the top of                  19 the page do you see the marking for the inner fence?                  20 <b>A. Yes, the inner fence and if you -- it's actually easiest                  21 to see as you move to your right you can come down that                  22 line, you see a very distinctive corner and then it                  23 drops down in the orientation of this photograph, that                  24 would be the inner fence.</b>                  25 THE CORONER: Let us see whether we can put the cursor on</p> <p style="text-align: center;">Page 59</p>
<p>1 which just comes off the concrete barrier, pointing down                  2 in a diagonal towards the living quarters?                  3 THE CORONER: Can we just put the cursor on one of them?                  4 Come left about an inch. Right there.                  5 <b>A. Ah those. Those are light towers for lights and for                  6 CCTV.</b>                  7 MR POPAT: It is not easy to -- I am grateful to those on my                  8 right. If we turn again over the page to photograph 6                  9 do we see those light towers and CCTV towers?                  10 <b>A. Yes, you can see them going all the way around between                  11 those fence lines. They were located in between the                  12 outer and the inner fences, were these light towers and                  13 CCTV camera towers.</b>                  14 Q. It is not easy to see on the photograph 5, but between                  15 the concrete barriers and the light posts is the outer                  16 fence; is that right?                  17 <b>A. That's correct.</b>                  18 Q. We can again see that in photograph 6?                  19 <b>A. Yes.</b>                  20 Q. And you were asked about the height of it. We get an                  21 idea of the height of it because we can compare it to                  22 the tanker which, I think, the third vehicle along in                  23 photograph 6 from the photographer which we can all                  24 imagine its rough height and we see where that is in                  25 relation to the outer fence, yes?</p> <p style="text-align: center;">Page 58</p>	<p>1 that one so we all know what we are talking about.                  2 MR POPAT: Can you see the cursor on the screen, Mr Cobb?                  3 <b>A. Yes.</b>                  4 Q. Is that in the right place?                  5 <b>A. No, come down with the cursor slightly. Right there.                  6 You are touching the inner fence so that you can see the                  7 light towers and the CCTV camera towers are in between                  8 those two fence lines, if you look closely there.</b>                  9 Q. That might be a useful point to just show all of these                  10 markings. If we turn, if the operator of the cursor                  11 would be kind enough to move it slightly to the right,                  12 that's the outer fence?                  13 <b>A. That's correct.</b>                  14 Q. And within the outer fence we see a light post or CCTV                  15 post?                  16 <b>A. The cursor is pointing straight at it, yes.</b>                  17 Q. And if we go further to the right we see the T bar                  18 barrier going round the perimeter?                  19 <b>A. That's correct.</b>                  20 Q. Thank you. Going back to the route into the living                  21 quarters part or the part where all the buildings are in                  22 in the BdV, coming down the page in this photograph at                  23 5, the vehicle that wants to proceed into that area                  24 where building marked N is would have to pass a gate?                  25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 60</p>

<p>1 Q. Another gate. You were trying to position where that 2 was and again, if I could ask the person operating the 3 cursor to move to where block N is and then would it be 4 right, Mr Cobb, just above that and to the left?</p> <p>5 <b>A. You see this bus right here or this vehicle? It looks 6 like it's almost directly across and parallel with the 7 gate to me.</b></p> <p>8 Q. That white oblong which we can see there is in fact, we 9 can see from other photographs, a bus which seems to 10 have been positioned perhaps across the gate at the time 11 the photographs were taken just after the incident.</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. But that is another gate and how is that gate operated?</p> <p>14 <b>A. It's a manual -- I believe it is a manual sliding gate. 15 I was asked that question before and I couldn't recall 16 if it's a swing gate or a sliding gate but I seem to 17 recall it's a slider now. And that gate was in a closed 18 position at all times unless it allowed a vehicle with 19 a valid reason for entering and clearance to enter then 20 it would be opened, the vehicle would come through it 21 and the gate would be immediately closed again.</b></p> <p>22 Q. Because the problem that you have identified, the 23 practicality of keeping the other gate open to allow the 24 procession of vehicles was only necessary for the 25 vehicles exiting presumably from the car parks?</p> <p style="text-align: center;">Page 61</p>	<p>1 <b>the inner facility.</b></p> <p>2 Q. And that would be manned by guards, SSI guards or the 3 civilian guards we have been talking about?</p> <p>4 <b>A. Yes, that's correct.</b></p> <p>5 THE CORONER: So that is just as it were, the cursor is 6 nearly on it, yes? That is that.</p> <p>7 <b>A. Yes, bottom right-hand corner of the block numbered "C".</b></p> <p>8 MR POPAT: So just tying that all up. If a vehicle is 9 coming into the BdV it would be required to be parked 10 outside this whole area if it's a non-company vehicle 11 unless it's a permitted vehicle of the catering type?</p> <p>12 <b>A. Correct.</b></p> <p>13 Q. So that would be at the top right?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. If it comes through the chicane and up to the first gate 16 and the permitted through it would then ordinarily be 17 parked in the car park either to the left or the right 18 and positioned there?</p> <p>19 <b>A. That's correct.</b></p> <p>20 Q. And if a person in the vehicle wanted to come out and 21 into the area below the block marked "N" how would they 22 or where would they have to pass through in order to get 23 access in to the second gate? So if a pedestrian wanted 24 to come into that area they would come out of their car 25 in the car park and where would they have to go through?</p> <p style="text-align: center;">Page 63</p>
<p>1 <b>A. That's correct and more importantly, there are two 2 reasons for having that inner gate as well. And 3 fundamentally what we are trying to do is restrict 4 traffic within this entire camp area because before 5 these exterior parking lots were built and so forth you 6 have got a lot of vehicle traffic moving around, people 7 driving, and you have got 800 people in there so you 8 have got pedestrians walking around so it was a huge 9 safety hazard. So hence the reason to restrict to an 10 absolute minimum any vehicles within that area so that 11 we didn't have that vehicle personnel interface issue.</b></p> <p>12 Q. Was that gate operated or manned by a guard?</p> <p>13 <b>A. The --</b></p> <p>14 Q. The second gate?</p> <p>15 <b>A. The second gate?</b></p> <p>16 Q. Yes?</p> <p>17 <b>A. Yes, it would be opened by either the guard from the 18 front guardhouse or one of the guards in the guardhouse 19 that is just slightly above and to the left of the bus 20 that we just spoke about that's across that gated 21 entryway.</b></p> <p>22 Q. So just to the bottom right-hand corner as we look at 23 the photograph of the car park we see a white oblong 24 building. Is that the guardhouse or checkpoint?</p> <p>25 <b>A. Yes, I would call that the access control guardhouse to</b></p> <p style="text-align: center;">Page 62</p>	<p>1 <b>A. You would come around that building that's in the bottom 2 corner of the block marked C and there was a personnel 3 gate right there directly to the side of that personnel 4 gate was the T bar, I'm sorry, T card board for our 5 facilities.</b></p> <p>6 Q. So where the cursor is on the screen still, Mr Cobb, 7 that is pointing to the access control house. The 8 person coming into the lower part of the BdV would have 9 to go through there and be subjected to the requisite 10 access control search and checks?</p> <p>11 <b>A. You would be required to do that on -- if you were 12 coming back into the facility after an extended period 13 off-site ie in other words, you have come back from your 14 rotation, your time off and you came in on the bus or 15 you came in on a car you would have to go through and do 16 baggage control. So they would search your bags when 17 you came through. If you were already on site, you had 18 already received your T card back, because when you 19 first came in from a crew change you wouldn't have your 20 T card anymore.</b></p> <p>21 Q. Again, something you have mentioned many times. I don't 22 think any of us actually know what a T card is, or 23 certainly I don't, perhaps you can explain what it is?</p> <p>24 <b>A. A T card was a way to identify you as having a valid 25 reason to be on site. It would have your name on it.</b></p> <p style="text-align: center;">Page 64</p>

16 (Pages 61 to 64)

1 **I can't remember if they had photographs on them or not**  
 2 **and it might have your job title on it and it was**  
 3 **a T card, it was wider at the top, it was shaped like**  
 4 **this to go down, it would fit into a slot.**  
 5 THE CORONER: So shaped like a T hence the name.  
 6 **A. Yes, shaped like a T and that allowed you to know anyone**  
 7 **who was inside the facility at any given time and if you**  
 8 **left the facility as I explained before, for example, to**  
 9 **go to the CPF you would take your T card with you. That**  
 10 **way you were off of the premises and when you got to the**  
 11 **CPF you would redeposit your T card in the T card board**  
 12 **at the entryway to the CPF.**  
 13 MR POPAT: So there was a rack at or about that point where  
 14 the cursor is where the T card had to be deposited  
 15 before somebody got entry into the lower part of the BdV  
 16 and when they exited that they had to take their T card  
 17 again and deposit it at the similar rack at the CPF if  
 18 that's where they were going to?  
 19 **A. That's correct.**  
 20 Q. People within the facility ie below the point marked  
 21 with a second gate should only be those people who have  
 22 deposited their T cards in that rack?  
 23 **A. That's correct.**  
 24 Q. And that would be subject to the checks carried out by  
 25 the guards at that point?

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1 **A. That's correct.**  
 2 Q. Perhaps we can do it quickly in relation to the CPF  
 3 without necessarily going through the photographs.  
 4 Again, if somebody was travelling from the BdV to the  
 5 CPF they would come back up that road where there's the  
 6 letters B and A. They would, in this case, in this  
 7 instance turn left at the road and then carry on up past  
 8 the Gendarme camp --  
 9 **A. Correct.**  
 10 Q. -- and up to the CPF entrance. The CPF entrance  
 11 would -- I was just trying to see if there was  
 12 a photograph which could be put up on the screen which  
 13 would make it easier to see and I think perhaps the  
 14 photograph at NAS 24, page 2 which is an overview, we  
 15 see the BdV, bottom right, Mr Cobb, someone wanting to  
 16 go up to the CPF would come back out of the BdV, up that  
 17 access road?  
 18 **A. Okay.**  
 19 Q. Take a left, go up the road, past the Gendarme camp?  
 20 **A. Correct.**  
 21 Q. Carry on up the road and get to the entrance for the  
 22 CPF?  
 23 **A. That's correct.**  
 24 Q. And at the entrance for the CPF again there are chicanes  
 25 made of similar posts to the ones we just saw at the

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1 BdV?  
 2 **A. No.**  
 3 Q. Any chicane?  
 4 **A. Yes, they were concrete T bars.**  
 5 Q. So concrete T bar chicane as opposed to the metal post  
 6 chicane and again concrete T bars around and outside?  
 7 **A. There was concrete T bars partially around the CPF all**  
 8 **on the front side as we're coming up this road. I can't**  
 9 **recall on the right-hand side of the facility, I'd have**  
 10 **to see a photograph to refresh my memory.**  
 11 Q. It may not matter too much to look at the particular  
 12 detail but essentially the same physical protections  
 13 around the CPF as around the BdV?  
 14 **A. Generally speaking, yes.**  
 15 Q. Certainly in some places I think as you are indicating  
 16 not the same protection in that there weren't concrete  
 17 barriers all the way round the CPF and there may be  
 18 other differences but in principle the same  
 19 arrangements, concrete barriers, inner and outer fence?  
 20 **A. Yes with the principal difference being that there was**  
 21 **no external parking lot at CPF as there was in the BdV.**  
 22 Q. Because vehicles would not be permitted to go that close  
 23 to the CPF?  
 24 **A. No. The vehicles typically that went into the CPF were**  
 25 **our work vehicles that came from the BdV and given when**

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1 **this was actually built and designed there was no**  
 2 **external parking lot that had been designed like it was**  
 3 **at the BdV. In fact, when I first got to In Amenas**  
 4 **there was an alternative entryway that we used to get in**  
 5 **because the parking lot construction hadn't finished,**  
 6 **the new route into the base hadn't finished, the**  
 7 **chicanes weren't built, so we actually came in to**  
 8 **a secondary entrance that was hence closed off once that**  
 9 **primary entrance was opened.**  
 10 Q. That is the route in to either the BdV or the CPF. Any  
 11 vehicles travelling to In Amenas would, if they have  
 12 come from across the border have to go past the border  
 13 guards, through the military zone, into the Gendarme  
 14 protected zone. If they are using the roads, past the  
 15 checkpoint at La Recule, up to VCP1, beyond VCP1, if  
 16 they are going into the BdV, to the first gate, then  
 17 through the second gate and then into the BdV, or if  
 18 they were going to the CPF further up the road past the  
 19 Gendarme camp and then again through the barriers and  
 20 gates at the CPF?  
 21 **A. That's correct.**  
 22 Q. Can we consider just perhaps shortly some of the other  
 23 locations that were mentioned to you to try and provide  
 24 a comparison with the arrangements at In Amenas. REB,  
 25 Rhoude El Baguel, is a location you worked at from the

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<p>1 early to mid 90s?</p> <p>2 <b>A. That's correct. No, from the late 90s.</b></p> <p>3 Q. Late 90s, I'm sorry, yes. 97. Gendarme camp there?</p> <p>4 <b>A. There was a Gendarme camp there.</b></p> <p>5 Q. What was the size of the REB camp as compared to</p> <p>6 In Amenas?</p> <p>7 <b>A. You are speaking of the Gendarme camp?</b></p> <p>8 Q. No, the camp altogether?</p> <p>9 <b>A. There was a very different layout. You actually had two</b></p> <p>10 <b>camp. At one time we had three camps but as the</b></p> <p>11 <b>project matured we basically operated out of two camps,</b></p> <p>12 <b>the existing Sonatrach camp, because that was an</b></p> <p>13 <b>existing oil field that we came in to redevelop, so</b></p> <p>14 <b>Sonatrach was already operating it, there was already</b></p> <p>15 <b>a Sonatrach camp and then there was a Gendarmerie that</b></p> <p>16 <b>existed there. Our camp was built outside of the</b></p> <p>17 <b>Sonatrach camp, not integrated with it. So if you</b></p> <p>18 <b>looked at the two together, probably similar in overall</b></p> <p>19 <b>size to In Amenas. Individually either one of them</b></p> <p>20 <b>would have probably been slightly smaller. Maybe the</b></p> <p>21 <b>Sonatrach camp would have been a similar size.</b></p> <p>22 Q. And the Gendarme camp, where was that within those two</p> <p>23 camps?</p> <p>24 <b>A. Well, there was the main Gendarmerie which was on the</b></p> <p>25 <b>Route Nationale it was on the -- across the road, across</b></p> <p style="text-align: center;">Page 69</p>	<p>1 <b>A. Hassi Messaoud?</b></p> <p>2 Q. Yes.</p> <p>3 <b>A. Hassi Messaoud was a town, yes, it was an oil field and</b></p> <p>4 <b>a town.</b></p> <p>5 Q. The oil field was within the town?</p> <p>6 <b>A. I would say that the town grew up in the middle of the</b></p> <p>7 <b>oil field is what actually happened.</b></p> <p>8 Q. T212, what was that?</p> <p>9 <b>A. That was a mobile drilling rig.</b></p> <p>10 Q. A mobile drilling rig, moved around?</p> <p>11 <b>A. Moved around from well to well.</b></p> <p>12 Q. And that had some Gendarme protection attached to it in</p> <p>13 the sorts of numbers we have looked at in the document</p> <p>14 we were looking at before?</p> <p>15 <b>A. That's correct.</b></p> <p>16 Q. And the Enafor rig, again, a mobile rig?</p> <p>17 <b>A. That's correct.</b></p> <p>18 Q. If we turn just to continue briefly the guards who were</p> <p>19 located in In Amenas and these are not the Gendarmes or</p> <p>20 the military but the civilian guards who were there.</p> <p>21 Again, we have seen the numbers of those guards from the</p> <p>22 part of the security management plan we have looked at.</p> <p>23 Who was responsible for vetting and training those</p> <p>24 guards?</p> <p>25 <b>A. The vetting process actually was done by the</b></p> <p style="text-align: center;">Page 71</p>
<p>1 <b>the Route Nationale from the Sonatrach camp.</b></p> <p>2 Q. So that's on the road away from the camp?</p> <p>3 <b>A. Yes and there was a vehicle checkpoint further up the</b></p> <p>4 <b>road as well that was manned by the Gendarmes. And as</b></p> <p>5 <b>you pass the Gendarmerie and as you passed the Sonatrach</b></p> <p>6 <b>camp the project built a new road that went to the right</b></p> <p>7 <b>and basically ran down the border of the Sonatrach camp</b></p> <p>8 <b>and out in a virgin piece of desert we built a new camp</b></p> <p>9 <b>that was referred to as the expat camp although that is</b></p> <p>10 <b>a bit misleading because we did after some time move</b></p> <p>11 <b>nationals into that camp as well.</b></p> <p>12 Q. And that had a Gendarme camp within it?</p> <p>13 <b>A. It had a very small detachment of Gendarmes that were</b></p> <p>14 <b>within the broader walls of the expat camp and it was</b></p> <p>15 <b>a walled off section on its own. So in other words,</b></p> <p>16 <b>there wasn't free movement by the Gendarmes from their</b></p> <p>17 <b>little mini encampment into our camp.</b></p> <p>18 Q. They had a separate camp walled off from the areas where</p> <p>19 in fact the expats and nationals would be located?</p> <p>20 <b>A. That's correct.</b></p> <p>21 Q. The position -- I am not sure Hassi Messaoud was</p> <p>22 specifically identified as you will hear but</p> <p>23 Hassi Messaoud, location in town?</p> <p>24 <b>A. The --</b></p> <p>25 Q. It is in a town?</p> <p style="text-align: center;">Page 70</p>	<p>1 <b>authorities, because you had to go through the Wilaya</b></p> <p>2 <b>when you hired local individuals and any local would go</b></p> <p>3 <b>through some sort of background check, a vetting</b></p> <p>4 <b>process. As far as the training of them went they were</b></p> <p>5 <b>trained by liaison, all the guards on site and to my</b></p> <p>6 <b>knowledge I don't think we had any loss of guards when</b></p> <p>7 <b>we went to SSI, new guards that were brought on board,</b></p> <p>8 <b>so it was typically the OLS who did the training for the</b></p> <p>9 <b>guards, not the OLC, is my understanding.</b></p> <p>10 Q. One of the documents you were taken to yesterday was</p> <p>11 something called the "Instructions for security</p> <p>12 officers" in the core bundle behind divider 9, please.</p> <p>13 I think you have it there in front of you. It was put</p> <p>14 to you variously as a JV document or a document which</p> <p>15 the JV produced. Just so we understand its context.</p> <p>16 These are instructions for the security officers who are</p> <p>17 the guards as we have been describing them?</p> <p>18 <b>A. That's correct.</b></p> <p>19 Q. Is this a document which is produced by the liaison team</p> <p>20 people who were responsible for providing the</p> <p>21 instructions and training to those guards?</p> <p>22 <b>A. Yes, to the best of my knowledge it is.</b></p> <p>23 Q. So we put it in its proper context perhaps if we just</p> <p>24 turn over the first page, I think it is page 48, the</p> <p>25 guards who are described here as surveillance agents,</p> <p style="text-align: center;">Page 72</p>

<p>1 identified as having four main objectives which are set 2 out there. And then there is a summary of threats which 3 include, as we have looked at, entry by terrorists, 4 a forced entry by armed terrorists. It doesn't refer to 5 forced entry by 30 plus heavily armed terrorists, but it 6 does refer of course to entry by terrorists who are 7 armed, yes?</p> <p>8 <b>A. That's what it says, yes.</b></p> <p>9 Q. Is this a summary of the threats which are identified to 10 the guards so they're aware of them?</p> <p>11 <b>A. Yes, I would assume that would be the reason for having 12 this in here as part of the document, as part of their 13 training.</b></p> <p>14 Q. Below the bullet points under 1.1 we see the following 15 instructions: 16 "Describe the steps to be taken by the security 17 officers should such situations arise." 18 Then what follows, Mr Cobb, is it right, is a series 19 of sections. If we turn over just to the next page we 20 see under 1.4 things that the security officer must 21 ensure. They must be polite, positive, professional. 22 It deals with their dress code and the like. Just over 23 the page, how the guard post is to be manned and 24 cleanliness and handovers and the like. And then over 25 the page again to access control, detailed instructions</p> <p style="text-align: center;">Page 73</p>	<p>1 What this document does is having identified or 2 summarised various threats go through what the guards 3 must do in different situations; is that right?</p> <p>4 <b>A. That's correct.</b></p> <p>5 Q. There were in fact many other documents which did carry 6 out assessments of the risks of terrorist attack and the 7 type of terrorist attack and the control measures that 8 need to be put in place, weren't there?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. We can look at those. That is what the guards were 11 there to do and that's how they were vetted and trained. 12 There came a point when SSI took over responsibility 13 for the guards. Is that an accurate summary?</p> <p>14 <b>A. That's correct.</b></p> <p>15 Q. SSI, just help us understand what that is?</p> <p>16 <b>A. SSI?</b></p> <p>17 Q. What does it stand for?</p> <p>18 <b>A. The exact definition of SSI I'm not sure of. 19 Security -- I don't remember. But it was fundamentally 20 a security organisation that was an affiliate of 21 Sonatrach that they had set up to hire guards and deploy 22 them on locations. That was not the only company or 23 entity that they used to do it with. There was also one 24 back from my REB days. It was known as DSP.</b></p> <p>25 Q. But it is a division, a part of the state</p> <p style="text-align: center;">Page 75</p>
<p>1 on that page and over the page as to how they are to 2 carry out checks to permit control to people who are 3 coming in. Different requirements for people 4 approaching the camp with different provisions. We see 5 there are, on 3.2, employees, 3.3, BP employees residing 6 at other places, 3.4, visitors, and over the page the 7 requirement that any foreign vehicle must remain outside 8 the base in the car park save where authorisation is 9 given by the OLC to access the camp. OLC is liaison 10 again and their position just beyond the second gate we 11 looked at in the photograph.</p> <p>12 <b>A. That's correct.</b></p> <p>13 Q. I don't need to take you through the detail of the rest 14 of it but you have glanced at it now and it set out lots 15 of details about what checks are to be carried out for 16 access to vehicles and reporting and so on, up to page, 17 I think it is internal page 13, section 5, emergency 18 procedures. So these are the things that are identified 19 to the guards as potential emergencies and the fifth one 20 down is an intrusion and there are various others. We 21 see a couple of pages on at 5.5: If the guards discover 22 one or several intruders in the BdV of the site they are 23 to do various things. Set off the alarms, inform the 24 Gendarme; prevent escape but if the intruder is armed do 25 not intervene.</p> <p style="text-align: center;">Page 74</p>	<p>1 organisation --</p> <p>2 <b>A. That's correct.</b></p> <p>3 Q. -- and it was to take over responsibility for the 4 management of guards?</p> <p>5 <b>A. That's correct.</b></p> <p>6 Q. I said we would come back to this document. In the core 7 bundle behind divider 3 -- it is a green bundle again, 8 Mr Cobb, please. We see on the first page a letter 9 dated 12 December 2012, signed by Mr Chikhi, do you know 10 who that was?</p> <p>11 <b>A. Mr Chikhi, yes.</b></p> <p>12 Q. Who was that?</p> <p>13 <b>A. Mr Chikhi was the Director of Associations for Sonatrach 14 so he had responsibility for all the JV associations in 15 the country.</b></p> <p>16 Q. It is in French, which is certainly not helpful to me. 17 If you turn over a couple of pages there is an English 18 translation. Was this the communication that was 19 received from Sonatrach which stated that SSI would 20 carry out various functions?</p> <p>21 <b>A. Yes, it was a reminder by Chikhi that in his mind the 22 responsibility lay with the security company on site, 23 the affiliate of Sonatrach to do all of those things 24 such as liaison with the military --</b></p> <p>25 Q. Before you get ahead, that is what this document is.</p> <p style="text-align: center;">Page 76</p>

19 (Pages 73 to 76)

<p>1 Let us just look at it in a little detail. Page 13,                  2 this is the translation. It is said to be the                  3 establishment of the internal security management SIE.                  4 The decision of the SIE dated 5 July. We see reference                  5 to the Wali of Ourgla and then below it the minutes of                  6 the district security commissions, just in summary, are                  7 they government commissions in some shape or form?                  8 <b>A. Yes, I assume so, yes.</b>                  9 Q. "...report the involvement of expatriate managers in the                  10 management of internal security, which is contrary to                  11 the current regulations in force, in particular                  12 regarding:                  13 "Communications with military authorities.                  14 "The management of security measures in place,                  15 including but not limited to those relating to the                  16 security guards, entry control, electronic surveillance.                  17 For this reason and as required by the local and                  18 military authorities, we ask that from now on you inform                  19 the [JV] partner that managing internal security is a                  20 role to be carried out exclusively by Sonatrach.                  21 Clearly define the roles and responsibilities of the                  22 expatriate personnel charged with logistical                  23 communication and supporting responsibilities. These                  24 must under no circumstances interfere with the                  25 assignments of the [ISA] either currently in force or as                  Page 77</p>	<p>1 "To work in close collaboration with the Field                  2 Directors and the support, liaison and logistical                  3 services staff brought in by the JV partner.                  4 "To formulate the internal security plans and                  5 internal security rules."                  6 Then ignore the next one for the moment. The fourth                  7 one:                  8 "To inspect and permanently monitor the protective                  9 measures put in place at the Group/OOC sites and                  10 evaluate their effectiveness.                  11 "To periodically prepare reports on the security                  12 situation of the sites they are responsible for.                  13 "To manage the entry control, video surveillance and                  14 so on."                  15 Then:                  16 "To liaise with the authorities and security                  17 services, including those relating to the protection and                  18 escort of foreigners active within the organisation."                  19 Pass the next one again:                  20 "To ensure the regulatory procedures as laid down by                  21 the military authorities and the DCGA SIE structure are                  22 properly put in place and enforced."                  23 Right at the end:                  24 "To participate in various meetings organised by the                  25 local and military authorities of the region."                  Page 79</p>
<p>1 may be determined by Sonatrach.                  2 "As a reminder the [ISA] OOC or Field is either                  3 under the direct hierarchal authority of the Group                  4 Administrator, Director General of the OOC or Field                  5 Director (as appropriate) and under the managing                  6 authority of the SIE/AST Coordinator. Their principal                  7 duties are defined according to the decision cited                  8 below."                  9 That last paragraph, yet again contains a vast array                  10 of acronyms but essentially somebody would be the person                  11 who would be in charge and would report directly through                  12 the Sonatrach chain to the people above as identified in                  13 that paragraph?                  14 <b>A. That's correct.</b>                  15 Q. If we just turn over the page, please, we see those                  16 duties of that person and they are given a number of                  17 different potential titles at the top. Was this the                  18 person who became the ASI as you have described it?                  19 <b>A. Yes.</b>                  20 Q. And that is somebody who was based at In Amenas who was                  21 appointed as the ASI through this arrangement who had                  22 the responsibilities we are going to look at now?                  23 <b>A. Yes.</b>                  24 Q. They included, we see the -- look at the first bullet                  25 point:                  Page 78</p>	<p>1 These are all functions and duties placed on the ASI                  2 reporting up through the structure which is identified                  3 in the decree or the instruction from Sonatrach going up                  4 through to Sonatrach?                  5 <b>A. That's correct.</b>                  6 Q. The instruction was perhaps not so much in code but we                  7 see from the previous page expat managers must not get                  8 too involved in these things because they are not for                  9 the expat managers. They are for the SSI through the                  10 ASI to manage?                  11 <b>A. That's correct.</b>                  12 Q. But nonetheless there was a liaison team at In Amenas,                  13 always had been and that liaison team reported up                  14 through the routes we have looked at, through the                  15 business support manager but it continued to have a role                  16 in liaison after the appointment of SSI; is that right?                  17 <b>A. That's correct.</b>                  18 Q. What did you see its role to be?                  19 <b>A. As I testified before there was a lot of discussions</b>                  20 <b>around that and during this change there was a different</b>                  21 <b>general manager in place with Sonatrach, it wasn't</b>                  22 <b>Lotfi Benadouda it was Mimoun Benghenima, and</b>                  23 <b>I expressed some concerns to him as to what it would</b>                  24 <b>mean for this transition of SSI and we had a very long</b>                  25 <b>meeting to talk about specifically the duties that</b>                  Page 80</p>

<p>1 liaison would still carry out and those duties that ASI 2 would carry out. One of the principal concerns was that 3 originally it was reported that the ASI would report 4 directly outside the hierarchy on site to Sonatrach in 5 Algiers. I had extreme heartburn over this so we 6 reached a local agreement that the ASI would report 7 directly into the general manager, in this case Mimoun 8 Benghenima, which he sought the approval and acceptance 9 of this by Sonatrach in Algiers and came back and said 10 yes, this was acceptable. Consequently there was an 11 email, I believe Gary Butt, it may be in the records 12 somewhere, based on a meeting we had in our office. He 13 went through every single duty and who was responsible 14 for it so there was no confusion and there was complete 15 lack of clarity about who was going to do what. In 16 addition to that the charge that I continued to give to 17 liaison was that they had a very important role to 18 monitor the SSI organisation even though there were 19 certain responsibilities that were no longer in their 20 purview any more but they were to monitor them and audit 21 them to ensure they continued to carry out their duties. 22 Q. And the reports back from liaison that you were 23 receiving as to how this bedding in process was working, 24 you summarise just so we have the references to the 25 documents. If you look, please, in the core bundle Page 81</p>	<p>1 to, you are one of the people it is addressed to. 2 Again, this is an important document which we will, I am 3 afraid, need to look at it in a little detail in 4 a moment, but for present purposes can we just look over 5 the page, page 16, under the heading "IA SH SSI 6 Implementation", what does "SH" stand for? 7 <b>A. Sonatrach.</b> 8 Q. And I will if I may just paraphrase this to save reading 9 it in its entirety. But it explains the creation of the 10 new internal security department, SSI, to facilitate 11 transfer from BAAT to Sonatrach has now been approved by 12 the authorities. BAAT was a separate organisation, 13 another part of the state company which effectively 14 carried out vetting of guards and the like? 15 <b>A. No, BAAT is the name of a company that both JVs used to 16 hire third party staff, contract staff.</b> 17 Q. But BAAT was a state company? 18 <b>A. Not to my knowledge, I believe it was a private company.</b> 19 Q. That has been explained as the creation of the new IA 20 internal security department vehicle to facilitate the 21 transfer from BAAT to Sonatrach had been approved by the 22 authorities. The process now in implementation and the 23 ASI is to be in place. 24 It goes on to say, the last sentence: 25 "It is accepted this is a transitional phase which Page 83</p>
<p>1 behind divider 4, we have there again an email sent from 2 the liaison manager who we know was Mr Butt at this 3 point, his back-to-back was Mr Wigg, I think, the 4 liaison manager, dated 19 June 2012 to Mr Mimoun 5 Benghenima? 6 MR RICHIE: Sorry, can I give my apologies to my learned 7 friend. I wouldn't interrupt him save for this. The 8 witness Mr Cobb has mentioned an email from Gary Butt 9 that sets all this out and it may save you time, sir, if 10 it is possible for that email to be produced. We are 11 not aware on our side of it being produced to you in the 12 documentation. We may have overlooked it. 13 MR POPAT: I think it is this document. If you carry on to 14 page 18 it is signed by Mr Butt. 15 MR RICHIE: I am very grateful. 16 MR POPAT: Not at all. We'll confirm whether or not it is 17 in a moment with Mr Cobb but this is one signed off by 18 Mr Butt. 19 MR RICHIE: I am very grateful. 20 MR POPAT: It says on page 18: 21 "Gary Butt, B to B John Wigg." 22 B to B, that is back-to-back? 23 <b>A. Yes.</b> 24 Q. And he is the liaison manager. On the first page that 25 we were looking at, page 15, we see who it is addressed Page 82</p>	<p>1 requires gradual change which will require monitoring 2 and assessment and further review." 3 So Mr Butt at that time recognising the change and 4 indicating that there is a transitional phase which will 5 continue to require to be monitored and if further 6 modification is required they'll need to be undertaken, 7 yes? 8 <b>A. That's correct.</b> 9 Q. If you turn over the page there is a further document, 10 I am not sure the entirety of the document has been 11 copied, but it is again from the liaison department. It 12 is another internal security review, overview and 13 towards the bottom of the page we see under the heading 14 "SSI", again references to SSI and what has happened. 15 Here we see, don't we, the author of this document 16 from the liaison team saying the guards and internal 17 security now owned and operated by Sonatrach ASIs: 18 "Since the inception of this change there have been 19 a number of events which have highlighted associated 20 bedding in problems. The military have complained twice 21 about the drop in levels of access control to the field 22 and sites and during the recent strikes, civilians were 23 allowed access to the BdV despite clear instructions to 24 stop them. Indeed liaison management were not even 25 informed of their presence." Page 84</p>

21 (Pages 81 to 84)

<p>1 It goes on to say: 2 "The recent industrial action in IA has been close 3 to all at site and the recent lapses in access control 4 should not be viewed with taking this into 5 consideration. The striking drivers are close to the 6 SSI team and hail from the same towns and villages 7 producing a conflict of interest which will always be 8 difficult to manage. That said, irrespective of the 9 contributory factors, the project cannot sustain poor 10 access control and levels of SSI performance should be 11 closely monitored and corrective action taken if 12 required." 13 So liaison team continuing to monitor what's going 14 on with SSI and how they're monitoring the guards and 15 doing what the guards should be doing -- what needs to 16 be done to ensure the guards are doing their job and 17 reporting back that more needs to be done? 18 <b>A. That's correct.</b> 19 Q. Was that broadly an indication of the feedback you 20 received from the liaison team about the transfer to SSI 21 and what it was there to do? 22 <b>A. Generally. I didn't remember -- maybe I missed it as</b> 23 <b>you read it but the last paragraph before strike was the</b> 24 <b>key message I was receiving. We had some issues,</b> 25 <b>they're some bedding in problems but there's nothing</b> Page 85</p>	<p>1 I identify a document which provides some detail in 2 relation to that. It is the document behind divider 14 3 in the bundle. Again, we have looked at it briefly. 4 23 September. A document from Mr Bech to, amongst 5 others, you, dealing with the deployment of the staff 6 and explaining that, we looked at it already, that staff 7 will need to be taken off the site following a process 8 that he, Mr Bech, was trying to put in place? 9 <b>A. Yes.</b> 10 Q. And he was the operations manager who had responsibility 11 for making sure this side of things was able to be 12 effective properly? 13 <b>A. Yes.</b> 14 Q. And what he says at the bottom of that email is: 15 "We will over the next few days have to evaluate the 16 situation further as some of the services that will no 17 longer be available any more are essential for the 18 operation of the field. I will have to come back on 19 this issue one of the first days when we see how things 20 develop. A possible outcome is that we will have to 21 shut down the plant unless we can make sure that we can 22 operate in a safe manner." 23 Was there any question in your mind that the staff 24 would be permitted to remain at In Amenas if there was 25 a concern about safety? Page 87</p>
<p>1 <b>that we don't believe that we can overcome.</b> 2 Q. So far as the strike is concerned, you have summarised 3 this already, can I try and save time by seeking to put 4 something to you to see if you agree with it, the 5 problem the strikers had was with Sonatrach. The 6 relationship between the strikers and Statoil and BP was 7 not particularly affected by the strike but you and 8 Mr Bech from Statoil took a very active part in trying 9 to mediate the dispute? 10 <b>A. Absolutely, because the strikers, if they said it once,</b> 11 <b>they said it hundred times, we don't trust Sonatrach but</b> 12 <b>we trust BP and we trust Statoil.</b> 13 Q. And that included holding a number of meetings which I 14 think have been described as the town hall meetings 15 where you met with strikers and others concerned and 16 tried to carry out the mediation we have referred to? 17 <b>A. Those weren't the town hall meetings I referred to but</b> 18 <b>there were a number of meetings held with the strikers</b> 19 <b>just by myself and Tore because of the trust that</b> 20 <b>existed between ourselves and our two companies and the</b> 21 <b>strikers to try and mediate the dispute and find</b> 22 <b>a resolution to it.</b> 23 Q. As it was a question asked of you yesterday as to 24 effectively when the demanning began as a result of the 25 strike and the processes followed, it may just help if Page 86</p>	<p>1 <b>A. Absolutely not.</b> 2 Q. The remanning of staff -- 3 <b>A. Excuse me, is it possible for a five minute break?</b> 4 THE CORONER: Yes. Mr Popat, how ... 5 MR POPAT: I know. 6 THE CORONER: How do you think you are getting on? Just 7 time wise. 8 MR POPAT: Sir -- 9 THE CORONER: I appreciate I took up a bit of your time this 10 morning. I am grateful to you for that. 11 MR POPAT: It is kind of you to suggest that, sir. I failed 12 to meet the time estimate I gave you yesterday and that 13 is entirely my fault. I think I am afraid at least 14 another half an hour. 15 THE CORONER: Right. We'll take ten minutes now, all right 16 and then we'll do the half an hour and then that will be 17 it. 18 <b>A. All right, thank you, sir.</b> 19 <b>(11.40 am)</b> 20 <b>(A short break)</b> 21 <b>(11.55 am)</b> 22 MR POPAT: Mr Cobb, I said we would come back to explain and 23 describe the liaison team and can we do that now. 24 The liaison team, is this right, were people who 25 held the posts that you have described, the assistant Page 88</p>

22 (Pages 85 to 88)

<p>1 liaison manager and the OLS and the OLC and whatever the  2 other acronyms were, within the liaison team function?  3 <b>A. That's correct.</b>  4 Q. They were people employed in fact by a separate company?  5 <b>A. That's correct, they were hired through another company.</b>  6 Q. That other company, was a company called at different  7 times AFMC, and Sterling?  8 <b>A. Initially the contract was with Sterling. It was</b>  9 <b>offshore. By that I mean with a foreign company and</b>  10 <b>then the contract in place at the time, there had been</b>  11 <b>a partnership formed between Sterling and another</b>  12 <b>company which then the basis became Algerian Facilities</b>  13 <b>Management Company, AFMC.</b>  14 Q. AFMC. Algerian Facilities Management Company.  15 A company by its name it would seem clear having a base  16 or at least a role to play in Algeria specifically?  17 <b>A. Yes, they had a large operation in the Red Med base.</b>  18 <b>That is where they were based out of basically. AFMC.</b>  19 Q. And the people they employed were experts in security  20 management and security issues at different grades and  21 different levels?  22 <b>A. Yes.</b>  23 Q. With specific and particular expertise and knowledge of  24 this region of north Africa?  25 <b>A. As far as I'm aware, yes.</b></p> <p style="text-align: center;">Page 89</p>	<p>1 <b>A. I don't know his name.</b>  2 Q. Again, two people taking up that post?  3 <b>A. Yes.</b>  4 Q. Then we don't need to go into the details and numbers  5 but were there people from the liaison team at In Salah?  6 <b>A. Yes, then you had a lead at each one of the project</b>  7 <b>sites who was an OLS.</b>  8 Q. Then let us just focus on In Amenas.  9 <b>A. Okay.</b>  10 Q. Therefore, does it follow that the same thing applied at  11 In Amenas and there was a liaison team presence at  12 In Amenas?  13 <b>A. That's correct.</b>  14 Q. And that was headed by the OLS?  15 <b>A. That's correct.</b>  16 Q. Which stands for?  17 <b>A. Operations Liaison Supervisor.</b>  18 Q. And who held that post at In Amenas?  19 <b>A. That was Paul Morgan and Anthony Fitzpatrick or as</b>  20 <b>I have referred to him, Fitz.</b>  21 Q. In addition to the OLS was there any other liaison team  22 person or people positioned at In Amenas?  23 <b>A. Yes, there was an OLC position based at the camp as well</b>  24 <b>as on each of the drilling rigs.</b>  25 Q. They were employed by this separate company, AFMC,</p> <p style="text-align: center;">Page 91</p>
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<p>1 Q. The people employed came from different backgrounds but  2 you described yesterday how some at least were  3 ex-military at the perhaps highest levels within the  4 different military organisations across the world?  5 <b>A. I think most if not all of them were ex-military, either</b>  6 <b>SAS, French Foreign Legion, US Navy Seals, we had some</b>  7 <b>US Navy Seals in the country so a variety, yes.</b>  8 Q. They were a separate team altogether, albeit having  9 a reporting line up to the business support manager at  10 Hassi Messaoud, as we have seen?  11 <b>A. That's correct.</b>  12 Q. Is it right that I think two of the liaison team were  13 based at Hassi Messaoud?  14 <b>A. There was two positions at the end of 2012 and beginning</b>  15 <b>of 2013, there was the ALM, the Algerian Liaison</b>  16 <b>Manager. That was one post and there was also I believe</b>  17 <b>an OLC, an Operations Liaison Coordinator who worked for</b>  18 <b>the ALM based in Hassi Messaoud.</b>  19 Q. Let us just put some names to these posts. Algerian  20 Liaison Manager. Who were they?  21 <b>A. That was, it was Gary Butt and John Wigg.</b>  22 Q. And they were two people taking that post because they  23 were back-to-backs?  24 <b>A. That's correct.</b>  25 Q. Operations Liaison Coordinator, based at Hassi?</p> <p style="text-align: center;">Page 90</p>	<p>1 presumably, and we'll hear from some of them at least  2 with their own internal reporting lines through AFMC but  3 with the line in to the business support manager at  4 Hassi?  5 <b>A. That's correct.</b>  6 Q. Can we just look at their function and roles and the  7 coroner asked and I didn't provide an answer through you  8 as to whether or not they dealt with security, but  9 generally put is it right that they dealt with security?  10 <b>A. That's correct.</b>  11 Q. If we turn, please, in the core bundle to divider 21.  12 That is the green bundle again, Mr Cobb. This is  13 a document, Mr Cobb, which has been produced by  14 Mr Fitzpatrick, Fitz, you see at the top left-hand  15 corner in red some details which include his name,  16 right?  17 <b>A. Yes.</b>  18 Q. All I want to do with you, please, is to look at some of  19 the descriptions provided here to see if they accord  20 with your understanding of the liaison team's function.  21 You see this is dated September 2009. It relates to  22 In Amenas operations. If we just turn over the page and  23 look at the contents page you will see a number of  24 topics or issues which include liaison philosophy,  25 operator liaison staff, liaison procedures and then in</p> <p style="text-align: center;">Page 92</p>
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<p>1 two annexures, operational requirements, detailed 2 statements in relation to perimeter fencing, CCTV, 3 perimeter lighting, chicanes, vehicle barriers and 4 monthly liaison situation procedures. 5 So in various ways are these the sorts of things 6 that came within the remit of the liaison team to deal 7 with? 8 <b>A. Yes.</b> 9 Q. They are called the liaison team and as I said to you 10 before, that might seem an unusual name. Why are they 11 called the liaison team? 12 <b>A. Fundamentally they're called liaison because their 13 principal role was liaising with the authorities, the 14 Gendarmes, the military, as part of their overall effort 15 to manage security on the sites. Also the Algerian 16 government does not allow foreign operators to bring 17 security personnel into the country.</b> 18 Q. Thank you. Can we then just turn over the page at 19 page 227 and look at some of the points made in this 20 document. There is a description of the project under 21 1.1 which is broadly consistent with everything we've 22 heard. And in the third paragraph down under that 23 heading it says: 24 "The Algerian authorities are still sufficiently 25 concerned about security incidents occurring in all the</p> <p style="text-align: center;">Page 93</p>	<p>1 and to secure and protect project areas in In Amenas 2 project areas so that project personnel can move freely 3 without escorts and to effectively arrange escorts where 4 necessary. Minimise numbers of military required 5 commensurate with good safety practices in order to 6 manage costs. Minimise risks of delays or an incident 7 both of which can lead to an increased schedule of 8 costs. Maintain good relations with the authorities in 9 all project areas for the full duration of the project 10 life." 11 Again, agree with that summary for the purpose of 12 providing adequate and effective liaison with the 13 military? 14 <b>A. Yes.</b> 15 Q. Over the page we have definitions and perhaps I can 16 shorten this by saying the operator is effectively the 17 JV. Liaison staff are the liaison team, the AFMC people 18 and site guards are the Algerian national personnel who 19 are required to have a minimum standard of training 20 consistent with British Standard 7499 which has been 21 translated and used for the project. And that no site 22 guards on the In Salah project will be armed. We'll 23 hear from Mr Fitzpatrick as to the relevance of that to 24 In Amenas, but those are the people identified in this 25 document.</p> <p style="text-align: center;">Page 95</p>
<p>1 project areas that they insist operations have military 2 escorts and protection at all work sites for the 3 protection of expatriates and project facilities." 4 Then that is Sonatrach and BP and Statoil have 5 worked together for many years and have developed a good 6 working liaison. Then the project area comes within the 7 command of the fourth military region under the Wilaya 8 of Illizi. Then the military authorities have provided 9 a Brigade of Gendarmes to secure the IA zone from Ohanet 10 to Larache VCP in the south. Originally protection 11 uniquely for the protection of project expat staff but 12 more recently military received orders to extend this to 13 protection of all personnel as well as project assets 14 ie gas plant, BdVs, rigs, 4 by 4 vehicles and so on. 15 Then the mission of the liaison team is said to be, 16 in the next section: 17 "To provide personnel and systems to protect people, 18 property and premises." 19 A pithy but fair summary of their mission? 20 <b>A. Yes.</b> 21 Q. And we have security objectives set out and then below 22 those it says: 23 "And to provide adequate and effective liaison with 24 the military protecting the project in order to (1) 25 encourage zone patrolling by the military where possible</p> <p style="text-align: center;">Page 94</p>	<p>1 Then underneath section 1.4, responsibilities: 2 "Military and Gendarmes. The security of the 3 project is the responsibility of the Algerian civil 4 authorities and military security forces." 5 Is that something you understood? 6 <b>A. Yes.</b> 7 Q. The operator is responsible for the safety of its 8 employees and its contractors whilst in its field areas 9 under the operator's control and then this: 10 "Operator's liaison staff will be the sole 11 communication link and sole point of contact between 12 operations and/or contractors and the Algerian civil 13 authorities and military security forces that provide 14 protection and escorts for the project at all levels." 15 They were to be the sole point of contact with the 16 military? 17 <b>A. That's correct.</b> 18 Q. "The operator's liaison staff will retain sole point of 19 contact with level 1 Algerian military and Gendarme 20 officers". 21 So sole point of contact with the Gendarmerie, yes? 22 <b>A. That's correct.</b> 23 Q. Then there are a list of various people who are covered 24 within that description. 25 Over the page, just as we have the document open,</p> <p style="text-align: center;">Page 96</p>

<p>1 page 229, under 1.6:                  2 "Military manning levels:                  3 "Operator [and contractor] recognise that the                  4 military have full responsibility for the actual                  5 deployment of their military in numbers as they see                  6 fit."                  7 Again, something you were familiar with and what you                  8 accepted?                  9 <b>A. Yes.</b>                  10 Q. All of that consistent with your understanding of the                  11 function of the liaison team?                  12 <b>A. Yes.</b>                  13 Q. Did, as far as you were aware, the liaison team and the                  14 people within it carry out their functions properly and                  15 competently?                  16 <b>A. Yes.</b>                  17 Q. You have had a relationship with members of the liaison                  18 team, I think you said particularly with Mr Fitzpatrick                  19 and Mr Morgan?                  20 <b>A. That's correct.</b>                  21 Q. Is that because they were based at In Amenas and                  22 therefore people you see more regularly?                  23 <b>A. Yes.</b>                  24 Q. You explained how you sought to gain information from                  25 them as soon as you could but is it also right that that</p> <p style="text-align: center;">Page 97</p>	<p>1 internally, page 92. So there is no mystery about this,                  2 I said that in the procedure for guards there was                  3 a summary of risk which had been identified for the                  4 guards and they identified risks of terrorist attack.                  5 The threat of terrorist attack in different forms was                  6 something that was always recognised in the course of                  7 the life of the project; is that right and fair?                  8 <b>A. That's a fair statement.</b>                  9 Q. The threat as identified by the liaison team in the                  10 security management plan, and this is                  11 dated December 2012, is provided in the overview at the                  12 bottom of this page:                  13 "Terrorists and criminal organisations, threat from                  14 bandits and smugglers has been constant within the                  15 project area and the security forces have periodically                  16 encountered such groups around the project locations."                  17 There is reference to bandit and smuggling groups                  18 activities:                  19 "Aside from isolated incidents their attacks have                  20 not exhibited the same level of violence as shown by the                  21 terrorist organisations. Nonetheless criminal gangs                  22 operating in the southern desert regions are normally                  23 heavily armed and represent a very real and ongoing                  24 threat to ISG operations. However, to date their                  25 standard operating procedure is to avoid where possible</p> <p style="text-align: center;">Page 99</p>
<p>1 wasn't something that they were obliged to do ie provide                  2 you with information. They were required to provide the                  3 information within the channels that we have identified                  4 and if they are to have any liaison with the military                  5 they would be the people who would be able to carry it                  6 out?                  7 <b>A. That's correct.</b>                  8 Q. They provided advice to the JV at all stages of the                  9 project; is that right?                  10 <b>A. That's correct.</b>                  11 Q. They produced reports, reviews, summaries and obviously                  12 the oral contact that you and presumably others had with                  13 members of the liaison team at various times, again,                  14 throughout the course of the project?                  15 <b>A. That's correct.</b>                  16 Q. Can we just look at some of the things that they                  17 provided to see what their views were about security and                  18 what needed to be done to provide the protection they've                  19 identified here.                  20 First, please, the security management plan, which                  21 is a document we have looked at many times, behind                  22 divider 11 in the core bundle. The document we have                  23 already looked at, produced and then updated by the                  24 liaison team staff. Can we just look at some passages                  25 we haven't focused on, please, Mr Cobb. Page 3</p> <p style="text-align: center;">Page 98</p>	<p>1 well protected targets with military protection.                  2 "The crossover and joint activities between                  3 terrorist and criminal gangs is significant but                  4 frequently difficult to define. It is often against                  5 opportunistic targets such as expatriates travelling                  6 without adequate security protection or cover in                  7 isolated regions."                  8 Not advised to do that and offer a target for                  9 kidnap. This is all identified and part of the                  10 assessment carried out by the liaison team repeatedly                  11 throughout the time on the project?                  12 <b>A. Yes.</b>                  13 Q. They go on to say, and these are passages, or some of                  14 them are passages Mr Ritchie read out to you so I won't                  15 go through them again with you. The next paragraph                  16 Mr Ritchie identified, historically the threat generally                  17 less significant in the south but it cannot be                  18 discounted, particularly in light of the recent unrest.                  19 Then that the southern terrorist activity has been                  20 an inherent threat and risk for many years. A key                  21 incident was the kidnapping of 28 tourists followed                  22 since by periodic armed conflicts and incidents between                  23 the security forces and the terrorist groups.                  24 Then this, which wasn't I think read out to you:                  25 "This threat is countered by significant Algerian</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

<p>1 security forces presence throughout the southern region                  2 as well as individual military detachments assigned to                  3 all project sites. This provides effective protection                  4 and also serves as a strong deterrent to potential                  5 attackers of project sites and personnel."                  6 Yes?                  7 <b>A. Yes.</b>                  8 Q. Then a paragraph which deals with the Algerian terrorist                  9 group, again, read out by Mr Ritchie so I won't do the                  10 same. And then the next paragraph identifies the                  11 concern that:                  12 "The Sahel region acts as a safe haven and base for                  13 terrorists from which to plan and launch attacks across                  14 the region. The fall of the Libyan regime and the                  15 subsequent flow of illegal weapons into the Sahel region                  16 as well as the overthrow of the Malian government and                  17 subsequent armed Tuareg uprising and takeover of                  18 Northern Mali have destabilised the whole area."                  19 All of which was recognised again repeatedly by the                  20 liaison team?                  21 <b>A. Yes.</b>                  22 Q. Then the next sentence is one that was not read out,                  23 I think, by Mr Ritchie:                  24 "Lack of a functioning government and security                  25 forces presence in the Azawad region."                  Page 101</p>	<p>1 the Gendarmerie was to be carried out between the                  2 liaison team and those organisations. As far as you are                  3 aware insofar it was appropriate and necessary was that                  4 liaison being carried out?                  5 <b>A. Yes.</b>                  6 Q. At the bottom of that page we have the key risks and                  7 security challenges. Again, terrorist attack is                  8 identified there along with a number of other things.                  9 Then over the page it is said:                  10 "The following contributing factors and elements are                  11 taken into consideration when assessing project related                  12 security risks. Project sites situated at relatively                  13 isolated location, traditional centuries old smuggling                  14 and banditry routes pass through or near to the SFDP and                  15 ISG project sites. Expansive southern deserts largely                  16 uninhabited ranging from the project sites down to the                  17 southern borders. Despite significant distances from                  18 project sites this area is extremely difficult to                  19 control outside of the main towns. Instability in                  20 neighbouring countries. Impact is presently negligible.                  21 However this will remain an inherent risk for some time                  22 to come and has potential for escalation into Algerian                  23 territory."                  24 Throughout that and then in the passages that follow                  25 the liaison team set out what the security management                  Page 103</p>
<p>1 Which is in Mali, isn't it?                  2 <b>A. Mali, also into southern Libya as well I believe.</b>                  3 Q. "has led to a state of lawlessness in a region that                  4 because of its size and isolation was already virtually                  5 impossible to control and secure. To date this                  6 instability on Algeria's borders has not yet led to                  7 a marked increase in terrorism or criminal activity in                  8 southern Algeria."                  9 Then again I don't read the next passage because it                  10 was read to you. But then the final paragraph above the                  11 next heading says this:                  12 "The JV is not able to prevent any such terrorist or                  13 criminal attack and project protection is the                  14 responsibility of the Algerian security forces. The                  15 project approach to security management is that all                  16 security recommendations and procedures are aimed at                  17 minimising exposure to such risks and limiting the                  18 probability of such attacks and protecting personnel and                  19 installations in the event that such attacks should                  20 occur."                  21 Again, consistent with everything you had been told                  22 and continued to be told throughout your time at the                  23 project?                  24 <b>A. Yes.</b>                  25 Q. The liaison throughout this time with the military and                  Page 102</p>	<p>1 system is to try and guard against those risks and we                  2 have looked at many of those paragraphs, I won't go                  3 through them again. But if you just turn over, please,                  4 to the next page, having set those systems out and then                  5 set out the military protection two paragraphs up from                  6 the bottom:                  7 "This system is effective and acts as a deterrent."                  8 Did there ever come a time when the liaison team                  9 advised the JV, perhaps even you personally, that the                  10 system as they understood it, taking account of all of                  11 these risks that they had taken into account, was not                  12 effective?                  13 <b>A. No, I was never told that.</b>                  14 Q. Did they ever indicate that through their liaison with                  15 the Gendarmes or the military that they had expressed                  16 any concerns that meant that changes needed to be                  17 carried out or put in place?                  18 <b>A. Aside from the access control issues that we spoke about                  19 with the transition to SSI, no, none that I recall.</b>                  20 Q. In addition to the security management plan which was                  21 provided and updated on a frequent but not very regular                  22 basis they produced security reviews, didn't they, on                  23 I think it ended up being a six monthly basis?                  24 <b>A. Yes, I recall those.</b>                  25 Q. Let us just look at those quickly, if we may, behind                  Page 104</p>

<p>1 divider 4 in the same bundle. We have looked at this 2 email before. Just to put it in its full and proper 3 context, behind divider 4 it is the email from Mr Butt, 4 June 2012. Subject: IA 2Q 2012 internal security 5 review. That relates to the second quarter, 2012 6 internal security review? 7 <b>A. That's correct.</b> 8 Q. And its attachment is a security management plan. Then 9 we have his, the liaison team's regional security 10 overview below and it says that: 11 "Since the last security review in November 2011 the 12 security situation has evolved significantly due to 13 incidents and events in neighbouring countries bordering 14 Algeria." 15 The focus of attention is on the security situation 16 in Algeria. Then it sets out a list of key incidents 17 and events. I think all of which were included in the 18 chronology which Mr Ritchie took you to yesterday. And 19 then below those four numbered paragraphs it says: 20 "To date despite the closeness of the In Amenas 21 project site to the Libyan border and the risks of 22 smuggled Libyan weapons being used by AQIM groups in the 23 southern region there have been no signs of an increase 24 in incidents or activity in the project site region. 25 Despite the lack of evidence, firm indicators or</p> <p style="text-align: center;">Page 105</p>	<p>1 relation to events in Mali? 2 <b>A. Yes.</b> 3 Q. I won't go through the rest of the document but it goes 4 through over the page, fiscal security measures and the 5 like and all of those are reviewed and recommendations 6 made as appropriate by the liaison team for changes that 7 need to be undertaken? 8 <b>A. That's correct.</b> 9 Q. Further review, and this is in the latter part of 2012, 10 into the next divider, please, IA 4Q 2012 internal 11 security review overview. The first sentence: 12 "The general security situation in IA has remained 13 largely unchanged since the last internal security 14 review, and there have been no significant security 15 incidents that have directly impacted project 16 operations. The key incident to note post the second 17 quarterly review was the attack against the Regional 18 Gendarme Headquarters in Ourgla that killed one Gendarme 19 and injured several others." 20 Then identification of the responsibility taken by 21 the terrorist organisation. 22 We can just skip through the next paragraph. Again, 23 it identified the headlines that are created by the 24 security situation in Mali and then goes on in the 25 following paragraph to talk about the Sahel region and</p> <p style="text-align: center;">Page 107</p>
<p>1 specific incidents the potential for smuggled arms to be 2 used in criminal or terrorist activity this threat will 3 remain an inherent risk for the immediate future 4 particularly concerning threat to aviation from the use 5 of MANPADS. The IA JV site military who are a proven 6 indicator of change in the security situation have not 7 altered their standard operating procedures or site 8 security measures and their security stance remains 9 unchanged." 10 Again, consistent with everything that had been 11 communicated to you? 12 <b>A. Yes.</b> 13 Q. Again, taking account of all of these risks these were 14 the views of the security people employed. 15 The next paragraph, again, makes reference to the 16 situation in Northern Mali and I will just go to the 17 last sentence of that paragraph just summarising what 18 precedes it which is to identify the risks of terrorist 19 activity spilling into southern Algerian: 20 "To date as the conflict develops refugee and rebel 21 displacements to camp locations on the Algerian border 22 have been reported but there has not been an increase or 23 pattern of incidents that demonstrates the situation in 24 the southern region has changed for the worse." 25 Again, the same thing that was identified to you in</p> <p style="text-align: center;">Page 106</p>	<p>1 again, repeats what was said in the previous quarterly 2 review but the last sentence says: 3 "The significant geographical distances from 4 northern mali provide an extensive buffer zone. 5 However, despite this fact the situation should be 6 considered a risk that requires assessment and 7 monitoring for signs of deterioration." 8 Again, makes reference to the US government warning 9 in September 2012 that Mr Ritchie took you to and says 10 towards the end of that paragraph: 11 "The message followed the pattern of previous 12 nonspecific generic warnings that are periodically 13 circulated which provide no clear direction or 14 assistance in managing risks. Such warnings generally 15 simply instill uncertainty surrounding the security 16 situation and do not result in increased vigilance. 17 There has not being a significant change in the 18 project's site military detachment security stance. 19 However, they have expressed a concern about our own 20 security provision notably complaining about the 21 distinct drop in access control levels." 22 Which we have looked at before. 23 So again, taking these matters into account the same 24 position and same views being expressed by the liaison 25 team save for the access control issues which are being</p> <p style="text-align: center;">Page 108</p>

27 (Pages 105 to 108)

<p>1 identified?</p> <p>2 <b>A. That's correct.</b></p> <p>3 Q. And they reach the same view over the page in relation</p> <p>4 to physical site security under the heading "Level of</p> <p>5 physical security is of an acceptable standard and a</p> <p>6 majority of outstanding items are being addressed."</p> <p>7 Now, in addition to the security management plan and</p> <p>8 the security review there were of course further</p> <p>9 communications from the liaison team. Let's just pick</p> <p>10 up one very quickly at divider 8 from Mr Wigg, the</p> <p>11 liaison team manager at Hassi Messaoud, addressed to</p> <p>12 a number of people, including you. It refers to a link</p> <p>13 below and he talks about the French intervention in Mali</p> <p>14 and to summarise it again, that the intervention appears</p> <p>15 to be a catalyst for the Islamists trying to take</p> <p>16 further ground and move south into government held</p> <p>17 areas. It is a calculated risk and so on. Then he goes</p> <p>18 on to say:</p> <p>19 "It is unlikely that events in Mali will have direct</p> <p>20 security implications on the projects. Both projects</p> <p>21 are a long way from the Mali border. However we can</p> <p>22 expect to see the military impose closer control on our</p> <p>23 movements and demand stringent access control measures</p> <p>24 are maintained, both of which we will need to comply</p> <p>25 with. It is expected that the conflict in Mali will now</p> <p style="text-align: center;">Page 109</p>	<p>1 <b>members of the team.</b></p> <p>2 Q. In addition to the monthly updates they provided weekly</p> <p>3 updates, yes?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. They were called different things, but there was I think</p> <p>6 an HMD liaison weekly meeting and then there was the IA</p> <p>7 liaison weekly meeting. It doesn't much matter if there</p> <p>8 were differences between the two but they were provided</p> <p>9 on a weekly basis?</p> <p>10 <b>A. That's correct, those were the documents that were</b></p> <p>11 <b>discussed at the IMT meetings.</b></p> <p>12 Q. We are not going to do this at any length because time</p> <p>13 simply doesn't permit, but can I just ask you to pick</p> <p>14 up -- or I'm not sure it is there. It is the first</p> <p>15 exhibit to Mr Johnston's exhibit. It is exhibits to</p> <p>16 witness Bill Johnston. I am not sure it is there.</p> <p>17 Mr Charnock is handing them to you. If we just turn</p> <p>18 first to page 129, please. As I say, Mr Cobb, time</p> <p>19 doesn't permit going through these reviews with you at</p> <p>20 this stage. But just so we all understand the sort of</p> <p>21 thing that was being produced by the liaison team if we</p> <p>22 look at 129 we see -- in fact, if we could, could you</p> <p>23 just go back a couple of pages to 127. We see it is</p> <p>24 from the IA liaison department. It is dated</p> <p>25 4 February 2012. It sets out the threat level for</p> <p style="text-align: center;">Page 111</p>
<p>1 continue and as the conflict evolves we may see refugees</p> <p>2 and Islamists trying to flee the country. Both will</p> <p>3 affect how the military manage our protection and we</p> <p>4 should expect some change in the future. The liaison</p> <p>5 team on the ground will work closely with the military</p> <p>6 to ensure it's managed effectively."</p> <p>7 Specifically arising from the intervention in Mali</p> <p>8 and dated 12 January 2013?</p> <p>9 <b>A. Correct.</b></p> <p>10 Q. In addition to security management plan, the security</p> <p>11 reviews, emails and communications, the liaison team</p> <p>12 provided what were called liaison monthly updates.</p> <p>13 I think you say in your statement this wasn't something</p> <p>14 you looked at and so I don't take you to them, but we</p> <p>15 can see them -- actually I don't think we can see them</p> <p>16 in the core bundle but there is a whole large volume of</p> <p>17 those in other papers, but they were updates provided by</p> <p>18 the liaison team on a monthly basis to a particular part</p> <p>19 of the JV updating them on the security situation and</p> <p>20 advising on any changes or steps that needed to be</p> <p>21 taken, yes?</p> <p>22 <b>A. Yes, I believe that document was one that they used</b></p> <p>23 <b>internally to communicate amongst themselves of changes</b></p> <p>24 <b>and summarising any information that they felt was</b></p> <p>25 <b>necessary to put out to their OLSs, OLCs, all the</b></p> <p style="text-align: center;">Page 110</p>	<p>1 Algiers and Sahara, it says it is at low, that is the</p> <p>2 threat level and it talks about travel to Algiers and</p> <p>3 so on and deals with various other things which I won't</p> <p>4 go through with you.</p> <p>5 If we turn on to page 129 we see a summary of the</p> <p>6 security incidents since the last reporting period.</p> <p>7 They are divided into two sections, the north and the</p> <p>8 south. In the south we see that there were successes by</p> <p>9 the security services in aborting an attempt to smuggle</p> <p>10 arms and various other details in relation to that</p> <p>11 activity.</p> <p>12 And just over the page we see first -- sorry, second</p> <p>13 paragraph:</p> <p>14 "In recent months army has deployed forces in border</p> <p>15 states of Illizi and Tamanrassat. Ground forces</p> <p>16 consisting of infantry, Gendarmerie and special troops</p> <p>17 gathered in the areas along the borders with Libya and</p> <p>18 Mali. Army adopted a new ambush strategy in desert</p> <p>19 corridors against smugglers and terrorists."</p> <p>20 And then the AMP forces launched a large scale clean</p> <p>21 up operation in desert sites searching for smugglers and</p> <p>22 arms dealers and so on.</p> <p>23 This sort of analysis identifying incidents that had</p> <p>24 occurred since the last meeting update had been produced</p> <p>25 a week before and carrying out the sort of</p> <p style="text-align: center;">Page 112</p>

<p>1 recommendations and analyses in this document was 2 something that was done on a weekly basis by the liaison 3 team? 4 <b>A. Yes, to the best of my knowledge, yes.</b> 5 Q. In that document we looked at on page 127 we saw that 6 the JV threat level for Algiers and Sahara was at the 7 low level? 8 <b>A. That's correct.</b> 9 Q. You have explained that the project was working to the 10 lower level -- sorry, it was at the lower level but 11 working at a medium threat level? 12 <b>A. Yes.</b> 13 Q. If we turn, please, to page 131 the next week, 14 11 February 2012, do we now see that it is said at the 15 top of that page, JV threat level for Algiers and the 16 Sahara low. Working at medium threat level? 17 <b>A. Yes.</b> 18 Q. And that certainly by that stage was the threat level 19 you were working to ie set at low but working to medium? 20 <b>A. That's correct.</b> 21 Q. We'll look at what that means in the crisis plan, but 22 again there are a series of matters set out in the 23 course of this document again with a description of 24 incidents in the north and the south. 25 As I say, time doesn't permit going through these in Page 113</p>	<p>1 documents, a change in the alert level that the JV was 2 working to from February 2012? 3 <b>A. That's on this particular document but I believe the low 4 security level working to medium was put in effect for 5 much longer time than that.</b> 6 Q. We certainly see it by that stage on the face of that 7 document? 8 <b>A. Yes.</b> 9 Q. It may be it is in earlier documents as well. We would 10 see numerous military successes in that there would be 11 a number of events identified where the military have 12 successfully foiled an attack or captured an arms haul 13 or captured terrorists or prevented terrorist activity 14 being undertaken? 15 <b>A. That's correct.</b> 16 Q. We would see periodically advice from the liaison team 17 about certain matters and looking at all of these 18 documents there may be advices in relation to physical 19 security or the need to ramp-up the access control 20 measures and various other things, but we would see the 21 liaison team proactively identifying the things that 22 they think need to be undertaken? 23 <b>A. Yes.</b> 24 Q. You looked at, with Mr Ritchie, lots of things in this 25 orange bundle. I am not going to ask you to turn it up. Page 115</p>
<p>1 any detail with you, Mr Cobb. We can provide references 2 and produce a chronology if that helps in due course and 3 it will list where these things are to be found in the 4 various materials we have in this bundle. 5 But having looked at just those two minutes would it 6 be fair to say by way of a summary that if we looked at 7 all of these weekly minutes for years preceding the date 8 of the attack, we would see a number of terrorist 9 related incidents in Algeria and neighbouring countries 10 over that period? 11 <b>A. That's correct.</b> 12 Q. We would see that there would be a much greater 13 incidence of terrorist attacks in the north than the 14 south? 15 <b>A. Yes.</b> 16 Q. We would see that if they went back to the period of 17 emergency rule that there would perhaps be an even 18 greater number of terrorist related incidents? 19 <b>A. My sense is there were more then, yes.</b> 20 Q. We would see certainly from 2011, a greater incidence of 21 events, I call them that advisedly, but events in Mali 22 and Libya which are being identifying as creating 23 potential risks to Algeria? 24 <b>A. That's correct.</b> 25 Q. We see, at least apparently on the face of these Page 114</p>	<p>1 It really doesn't -- we don't have the time to do this, 2 but if we looked at the chronology that Mr Ritchie took 3 you through we would see, wouldn't we, that over the 4 period he was referring to I think there were in fact 5 some six attacks, actual attacks or events, incidents in 6 Algeria over that period, at least two of the ones 7 identified were in northern Algeria, but there were six 8 attacks, all but possibly one in northern Algeria had 9 been identified in the liaison team minutes or in the 10 various other minutes or documents that were being 11 produced which Mr Ritchie described as BP documents but 12 they were JV documents that were identifying these 13 incidents? 14 <b>A. That's correct.</b> 15 Q. We would see that one of those involved an oil facility 16 and that was the facility at Hassi R'Mel? 17 <b>A. Hassi R'Mel, yes.</b> 18 Q. That is a government facility? 19 <b>A. Yes.</b> 20 Q. It in fact I think had been subjected to an attack prior 21 to 2011 over preceding years as well? 22 <b>A. Yes, I can remember instances where there was attacks on 23 Hassi R'Mel in the early days of my tenure in Algeria.</b> 24 Q. And it is a facility which holds very important 25 infrastructure for the Algerian state. It provides the Page 116</p>

<p>1 gas pipelines from and surrounding that area?</p> <p>2 <b>A. We referred to it as the Crown Jewel for Algeria.</b></p> <p>3 Q. And any attack which damages that infrastructure would</p> <p>4 damage Algeria's ability to function properly?</p> <p>5 <b>A. It would significantly impact their financial situation</b></p> <p>6 <b>and it would further carry on to impact operators who</b></p> <p>7 <b>were downstream of those facilities. By that I mean is</b></p> <p>8 <b>if there was a major event at Hassi R'Mel and they blew</b></p> <p>9 <b>up a pipeline and it happened to be the gas export</b></p> <p>10 <b>pipeline there was no way for our gas to go or any other</b></p> <p>11 <b>operator's gas to go so it had a very strategic</b></p> <p>12 <b>importance to Algeria.</b></p> <p>13 Q. That was one of the six attacks that was identified.</p> <p>14 The other five involved government officials, the Wali</p> <p>15 of Illizi or police or Gendarme stations, in Ourgla and</p> <p>16 Tamanrassat?</p> <p>17 <b>A. That's correct.</b></p> <p>18 Q. The rest were mainly events where threats were made or</p> <p>19 general events such as the fall of the regime in Libya</p> <p>20 and the situation in Mali or successes in foiling</p> <p>21 terrorist activity and again most of them were known</p> <p>22 about?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. None involved a foreign gas or oil company operating in</p> <p>25 the military zone?</p> <p style="text-align: center;">Page 117</p>	<p>1 a regular basis and considered by different people</p> <p>2 within the different organisations within the JV?</p> <p>3 <b>A. That's correct.</b></p> <p>4 Q. And if we looked at all of those they would also contain</p> <p>5 similar things to the assessments we have looked at for</p> <p>6 or from the liaison team?</p> <p>7 <b>A. That's correct.</b></p> <p>8 Q. The risks that were identified in the operation of the</p> <p>9 JV were fed into yet other documents and materials which</p> <p>10 identified those risks and carried out assessments and</p> <p>11 identified control measures that needed to be put in</p> <p>12 place?</p> <p>13 <b>A. That's correct.</b></p> <p>14 Q. Let's look very quickly, please, at just three</p> <p>15 materials. Crisis plan which we have touched upon.</p> <p>16 It's in the bundle. It is tab 13. JV crisis plan. It</p> <p>17 sets out effectively, I will do this again in summary</p> <p>18 form, the processes for increasing levels of security</p> <p>19 and establishing what needs to be carried out to protect</p> <p>20 assets and equipment during a crisis?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. And we have looked at it already, page 147 onwards,</p> <p>23 there are the different levels. Alert level low is</p> <p>24 where the situation is normal for the country in which</p> <p>25 you case you maintain periodic contact with the sources</p> <p style="text-align: center;">Page 119</p>
<p>1 <b>A. To the best of my recollection, no.</b></p> <p>2 Q. Albeit, to be absolutely clear there is some material</p> <p>3 which has been identified which identified potential</p> <p>4 warnings or threats in newspaper articles and the like?</p> <p>5 <b>A. Yes, that's what we have seen.</b></p> <p>6 Q. There was no advice having taken all of those matters</p> <p>7 into account from the liaison team to do anything</p> <p>8 radically different?</p> <p>9 <b>A. No.</b></p> <p>10 Q. In addition to all of the assessments undertaken by the</p> <p>11 liaison team and the documents produced BP also provided</p> <p>12 what was called a weekly summary of risks?</p> <p>13 <b>A. That's correct.</b></p> <p>14 Q. I don't take you to it. It is in the core bundle or</p> <p>15 some pages are in the core bundle behind divider 24. In</p> <p>16 fact, the large volume of the weekly summaries over the</p> <p>17 period of 12 months are again in exhibits to</p> <p>18 Mr Johnston's statement. For the coroner's reference,</p> <p>19 pages 244, 245, 247 in the core bundle. There are a set</p> <p>20 of extracts from the weekly summaries which were</p> <p>21 provided by BP having taken into account various sources</p> <p>22 of information that BP was able to take into account</p> <p>23 quite separate from the work done by the liaison team?</p> <p>24 <b>A. That's correct.</b></p> <p>25 Q. And those summaries were also provided to the JV on</p> <p style="text-align: center;">Page 118</p>	<p>1 of intelligence and review the crisis plan annually and</p> <p>2 then on the right-hand side there are various things</p> <p>3 that it is said should be carried out to make sure that</p> <p>4 the alert level is maintained at that level, yes?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. The JV was operating at medium level, so even though it</p> <p>7 said alert level low it was operating at medium, again,</p> <p>8 as we have seen in the documents we have just looked at,</p> <p>9 and that meant that the things that are on the next page</p> <p>10 were the applicable things?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. Is it right so we don't take too much time over this,</p> <p>13 that if we look at the middle column, some of those</p> <p>14 things which are indicators were present by 2012/2013,</p> <p>15 but some weren't?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. For example, there weren't demonstrations against the</p> <p>18 authorities, there wasn't a security threat that was</p> <p>19 direct at least and no civil unrest as such. We don't</p> <p>20 need to go through these but some were present, some</p> <p>21 weren't?</p> <p>22 <b>A. That's fair, yes.</b></p> <p>23 Q. And on the right-hand side there were a list of actions</p> <p>24 that were identified as being required to be undertaken.</p> <p>25 The second -- let us look at the first batch. It says</p> <p style="text-align: center;">Page 120</p>

<p>1 that the shareholders examined indicators to take to the                  2 next level. Decision to increase measures to medium,                  3 review all level low actions. Then various other things                  4 which include, the third bullet point:                  5 "Gather and dispute accurate information on the                  6 threat to employees, rumour control."                  7 Just pausing there. That was something that was                  8 done through what were called town hall meetings --                  9 <b>A. Yes that's correct.</b>                  10 Q. -- where employees were spoken to. It was done through                  11 team leader meetings?                  12 <b>A. That's correct.</b>                  13 Q. And it was done through, I think, instant management                  14 team meetings?                  15 <b>A. That's correct.</b>                  16 Q. The purpose or one of the purposes of all of those                  17 meetings was to communicate information to employees?                  18 <b>A. Yes, that's correct.</b>                  19 Q. Then additional security protections to be implemented                  20 to meet the increased threat. So these are on top of                  21 the low level ones and we see them: limit visitors.                  22 Were visitors limited?                  23 <b>A. We scrutinised the necessity any time we had a visitor</b>                  24 <b>make a request to come in.</b>                  25 Q. Staff movement limited?                  Page 121</p>	<p>1 Access to be limited to authorised personnel. That was                  2 done?                  3 <b>A. That's correct.</b>                  4 Q. Staff and visitors to wear ID badges, done?                  5 <b>A. That requirement, yes.</b>                  6 Q. Gates and barriers to be left closed?                  7 <b>A. Yes, except where I have explained with the gates, yes.</b>                  8 Q. Perimeter fencing to be tested and checked?                  9 <b>A. Yes.</b>                  10 Q. Lighting to be checked. Were there people employed                  11 specifically to do that?                  12 <b>A. Well some of the duties of the guards that we had on</b>                  13 <b>site that worked for liaison was to check perimeter</b>                  14 <b>fencing, verified the lights work, CCTV cameras.</b>                  15 Q. And then personnel to be encouraged to keep sites tidy.                  16 Emergency plans to be rehearsed and checked with the                  17 police if acceptable. Increased number of guards.                  18 Discuss with authorities requirements for extra police                  19 or army protection. Who would carry out any such                  20 discussion with the authorities if it were to be                  21 undertaken?                  22 <b>A. It would either have to be liaison or Sonatrach.</b>                  23 Q. Just turn over the page, please, and we'll look at this                  24 even more quickly. If the alert level was going to be                  25 high, then -- so in other words, if there was going to                  Page 123</p>
<p>1 <b>A. Yes.</b>                  2 Q. Locations and contact numbers of all visitors known and                  3 tested at all times?                  4 <b>A. Yes.</b>                  5 Q. All personnel briefed to make sure they keep their ears                  6 and eyes open?                  7 <b>A. Yes.</b>                  8 Q. Avoiding routine?                  9 <b>A. As much as possible, yes.</b>                  10 Q. To summarise the next ones, but access control, parking                  11 policy strictly to be observed, employees to keep a low                  12 profile, signage to be removed, no logos, keeping away                  13 from demonstrations et cetera, yes?                  14 <b>A. Yes.</b>                  15 Q. Facilities to be examined, personnel to ensure travel                  16 documents are at hand, exercising JV communications and                  17 so on. Warning relevant at risk personnel of their safe                  18 haven. Reviewing and updating all personnel records and                  19 other matters. Again, I am not suggesting that                  20 absolutely every single thing that is listed there were                  21 in place but were these the things that were actioned at                  22 the JV?                  23 <b>A. Yes, generally.</b>                  24 Q. Contingency planning is the next section. We won't look                  25 at that. But below that, protection of facilities.                  Page 122</p>	<p>1 be a change to the way the JV was working and we were to                  2 move to the high level, you would have to see some or                  3 all of the things that are in the middle column on this                  4 page; is that right?                  5 <b>A. That's correct.</b>                  6 Q. And that would include, to take the third bullet point,                  7 looting and civil unrest; fourth, targeted bombing;                  8 fifth, attack against oil and gas targets and so on.                  9 Emergency regulations, threat of foreign invasion,                  10 foreign groups infiltrating. Those are the sorts of                  11 things which would have to have occurred to take the                  12 level up from the level that you were operating at in                  13 any event in 2013?                  14 <b>A. Yes, that's correct.</b>                  15 Q. Was there any suggestion that those indicators were                  16 present by 2013 to take it up to that level?                  17 <b>A. No.</b>                  18 Q. Risk assessments were carried out. I am not going to                  19 take you to it. You were taken to a risk action plan.                  20 In fact, I think that wasn't a plan that was ever put                  21 into place, but there were risk assessments carried out                  22 and if we look just to the one specific to Algeria, we                  23 can see them behind divider 15. Between the                  24 holepunches, Mr Cobb, we see that this is the Algeria                  25 security risk assessment for 2012. This I think we will                  Page 124</p>

<p>1 hear from other witnesses was created by BP in fact in 2 relation to Algeria, all right?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. But there was a JV risk assessment specifically for 5 In Amenas. If you turn over to page 184 it specifically 6 identified the risks to the project, albeit in summary 7 form, these are just extracts from the document, but you 8 see on that page terrorism is identified as one of those 9 risks, and if you look at the yellow shaded box going 10 across from left to right, you will see that the impact 11 is identified as 5, probability at 3.5, going on to the 12 right, manageability, 4.0 and then primary risk, 18 and 13 residual risk 14. We'll just look at what that means at 14 a moment. But an assessment has been undertaken of 15 terrorism risk generally and then it is broken down into 16 the two parts. Domestic international terrorist groups 17 and then below that pipeline security. In the domestic 18 international terrorist group section we see a number of 19 risk comments which are identified which contribute to 20 the assessment of risk, including the fall of the Libyan 21 regime, AQIM activity, flow of illegal weapons, 22 particularly use of MANPADS and the profile of risks of 23 attacks against airports.</p> <p>24 Having taken those risks into account I think it is 25 the fifth column along on the right, actions in place Page 125</p>	<p>1 that the residual risk brings it down into the yellowy 2 green section in the second block on the right?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. And just so we can understand what all of that means, if 5 we turn back a page to 185 we see that the risk of 6 terrorism, which is number 1 in the residual risk matrix 7 at the bottom, is between the 8 to 15-section and so 8 it's at a medium risk?</p> <p>9 <b>A. That's correct.</b></p> <p>10 Q. I think it is right on the borders of medium to low on 11 the diagram we looked at just a moment ago. But having 12 carried out the assessment of the risks of terrorism and 13 identifying the control measures in place, the risk is 14 identified as being controlled and within that level?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. There is another risk matrix over the page which if we 17 just find -- page 187. It is not very well copied but 18 if you just find number 1 you see it is in the blue 19 shaded bit which in short means it is within the 20 acceptable level of risk?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. That was one of the risk assessments, it is the nearest 23 in time that we have there so, again, there is no 24 mystery behind any of this, there was another risk 25 assessment which had been carried out, in fact there Page 127</p>
<p>1 are a series of action points. Close monitoring of 2 terrorist and bandit activities, liaison with foreign 3 embassies, liaison with Algerian authorities, Algerian 4 security forces protect all project sites, control of 5 employee and visitors' movement. Control travel at 6 night -- and I really won't go through the whole list, 7 but if you just cast your eye across it, were all of 8 these actions actions that you understood were in place?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. The assessment therefore identified the risk of 11 terrorism as a primary risk of 18 but a residual risk of 12 14 which means in summary form, doesn't it, Mr Cobb, 13 that if you don't take the actions the risk is at 18 but 14 if you take the actions you are reducing the risk to 14?</p> <p>15 <b>A. That's correct.</b></p> <p>16 Q. If we go over a couple of pages to 186 we see some 17 attractively coloured blocks. Terrorism is the number 1 18 risk. It is item number 1. I think it was treated as 19 the number 1 risk but it is item number 1 and we see in 20 the top block that item 1 having taken these various 21 factors into account had a primary risk which put it in 22 the top right-hand corner in the red bit, yes?</p> <p>23 <b>A. That's correct.</b></p> <p>24 Q. But once the actions and the control measures that are 25 identified are taken then it is said in the box below Page 126</p>	<p>1 were a number of risk assessments. We see another one 2 behind divider 18. I think it has been copied 3 incorrectly, if you turn to the last page in that 4 divider, Mr Cobb, page 211, that in fact is the first 5 page and we see at the bottom of that page that risk of 6 terrorist attack and terrorist vehicle attack against 7 the facilities is -- both are identified and then again 8 a similar sort of format, hazard effects, control 9 measures required and an identification of the residual 10 risk if those measures are undertaken.</p> <p>11 If you just come back a page to 210, so it is clear, 12 we see that the review team, second entry down, are 13 various people who are in fact from the liaison team?</p> <p>14 <b>A. That's correct.</b></p> <p>15 Q. Including Mr Wigg and Mr Fitzpatrick. Those action 16 measures are all identified and required to be in place. 17 If you go right back to the front of the divider to 18 page 203 that in fact is the second page. We see the 19 different types of terrorist risk continuing to be 20 identified including risks from terrorists group, 21 including specifically from AQIM and then identification 22 of the measures that need to be undertaken, all of those 23 identified, assessed and measures put in place in 24 accordance with the advice that has been given?</p> <p>25 <b>A. That's correct.</b> Page 128</p>

32 (Pages 125 to 128)

<p>1 Q. At any stage did the views of the SSI or ASI, the person 2 you have described as taking up that role, differ from 3 the views of the liaison team as they were being 4 explained to you? 5 <b>A. No.</b> 6 Q. So in terms of the security risk assessment and the need 7 to take other measures to provide protection, nothing 8 was communicated to you that indicated the SSI or ASI 9 had a different view to the liaison team? 10 <b>A. No.</b> 11 Q. Did the Gendarmes ever communicate anything to you to 12 suggest that they held a different view? 13 <b>A. No.</b> 14 Q. Was there any communication from the Algerian military 15 that indicated that they had a different view? 16 <b>A. Not to me, no.</b> 17 Q. Did Sonatrach at any stage through any of its offices 18 indicate that they held a different view? 19 <b>A. No.</b> 20 Q. Statoil? 21 <b>A. No.</b> 22 Q. BP headquarters? 23 <b>A. No.</b> 24 Q. The British Embassy? 25 <b>A. No.</b></p> <p style="text-align: center;">Page 129</p>	<p>1 that he had? 2 <b>A. No, Seb in all honesty was really excited about where he 3 was and what he was doing and the opportunity he was 4 presented with. That was the way it came across to me.</b> 5 Q. But to be fair, you were the deputy general manager so 6 he may not have said things to you that he might have 7 said to others? 8 <b>A. That is true.</b> 9 Q. Mr Morgan, you described him as somebody who was your 10 fitness buddy, almost carried out workouts with him in 11 the gym? 12 <b>A. Yes, I mean Paul and I had that interaction almost every 13 day I was on site because we worked out at the same 14 time.</b> 15 Q. Did he give you any indication that he was leaving? 16 <b>A. No.</b> 17 Q. The final very short topic relates to the events of the 18 horrible day, Mr Cobb, and I am not going to take you to 19 anything in any detail, but there were some points that 20 you had explained in your witness statement to the 21 police which I am not sure have come out in the course 22 of the evidence you have given and I just want to see if 23 they are correct because they may help others understand 24 some points that may be of importance to them. 25 The first is that at one point in your statement one</p> <p style="text-align: center;">Page 131</p>
<p>1 Q. Any contrary views expressed by anyone to you or to the 2 JV within the best of your knowledge about the 3 assessment of the risk of a terrorist attack within 4 Algeria? 5 <b>A. No.</b> 6 Q. Mr Cobb, just two short and final matters, please. The 7 knowledge you had of two of the deceased in particular. 8 Mr John was on the Challenger programme and you said he 9 flew in with you and you were effectively I think to act 10 as his mentor or buddy, I'm not sure what the correct 11 phrase is, but there to help him adjust to the 12 environment he was then going to find himself in? 13 <b>A. The role I played was to escort him into the country and 14 help him through the processes initially which can be 15 a bit cumbersome at times and just make it a comfortable 16 entry for him into the facility.</b> 17 Q. And after he came into the facility did you come across 18 him? 19 <b>A. Yes, Seb and I actually ate dinner about the same time. 20 He seemed like he took dinner late and my job wouldn't 21 allow me to get out at normal times so we wound up 22 having dinner together each night in the cafeteria, 23 except for the last night. Obviously I skipped dinner 24 because of the strike meeting.</b> 25 Q. Did he indicate to you any particular concerns or issues</p> <p style="text-align: center;">Page 130</p>	<p>1 point in your statement you said that the conversations 2 you had with the military officers trying to persuade 3 them to communicate and take your advice as to where 4 people might be located and so on effectively got the 5 brush-off? 6 <b>A. Yes, from two military officers. The one that I sought 7 out and attempted to meet with initially after my escape 8 and then maybe within half an hour, 45 minutes after 9 that I mentioned I believe in my statement that an 10 attack helicopter landed on the highway just down from 11 the VCP and a very senior military officer got off that 12 aircraft along with a representative of the Wali I would 13 assume, it was a person dressed in traditional Tuareg 14 garb. They came in over into the parking area so 15 I attempted to speak to him and he wouldn't even speak 16 to me. Just put his hand up in my face and walked away 17 from me.</b> 18 Q. In your statement and for anyone needing the references 19 it is page 13 of the police statement you said that 20 having spoken to Said Sahnoun that you asked him if he 21 could contact the CEO of Sonatrach and get the military 22 to back off. Is that right? 23 <b>A. That's correct.</b> 24 Q. And he said to you that he would call the CEO and he 25 called you back and said he had talked to the CEO and</p> <p style="text-align: center;">Page 132</p>

33 (Pages 129 to 132)

1 that was all he could do?

2 **A. That's correct.**

3 Q. The second point, you mentioned in your statement, and

4 this is page 6 of 18, that having spoken -- this is

5 going back a little way in the chronology when there had

6 been a communication with the captain to try and work

7 out a way in which the fence could be cut so you could

8 exit, you say in the statement that the captain also

9 said "Tell Cobb he has to get out. The terrorists are

10 looking for him by name."

11 **A. That's correct, that's verbatim what Hocine told me --**

12 **Yassine told me that Captain Hocine said to him.**

13 Q. Finally this, and I apologise for asking this to be put

14 up on the screen again, but the page 5 of whichever

15 bundle it is where we have the BdV. Can we just

16 understand where the hole in the fence was cut and where

17 you expected it to be cut?

18 **A. Okay.**

19 Q. Can you just help us, Mr Cobb, I am not sure if, sir --

20 the cursor is going there anyway if you can direct the

21 cursor, Mr Cobb, as to where you expected the hole to be

22 cut?

23 **A. If you move the cursor just slightly to the right you**

24 **are going to touch the fence line. The fence line right**

25 **there. That is where we had requested it be cut because**

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1 **then we did not have to pass by what I assumed would be**

2 **a terrorist presence in the guardhouse.**

3 Q. And where was it cut?

4 **A. It was actually cut in the upper portion of the fence to**

5 **the right-hand side of the big tower that sits right in**

6 **the corner.**

7 Q. So if the cursor could go up and then --

8 THE CORONER: Round the corner effectively.

9 **A. Round the corner effectively. Somewhere in this area**

10 **here, between two of these containers and I can't**

11 **remember exactly the spot but it was exactly where**

12 **I didn't want to have the fence cut because I knew then**

13 **we'd be in view of the guardhouse.**

14 MR POPAT: The guardhouse to the right of that point?

15 **A. Yes, correct.**

16 Q. Mr Cobb, I hope I will be permitted to just say this

17 briefly. You are somebody who is actually out of the

18 jurisdiction, not in the UK and therefore you can't be

19 compelled to come and give evidence to this inquest.

20 You went through an horrific attack. You believed you

21 were going to be killed and friends and colleagues of

22 yours were killed. Yet you have provided a very

23 detailed witness statement and attended court to give

24 evidence and help. And certainly for BP's part may

25 I thank you for doing so and taking that time and effort

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1 to do so.

2 **A. If I may say while not compelled to do it I have deep**

3 **compassion and sympathy for every one of the families of**

4 **those that lost their lives and if through this process**

5 **my testimony helps them to find closure, to find peace**

6 **then I owe it to everyone.**

7 MR RICHIE: May I thank you, Mr Cobb, on behalf of the

8 families.

9 THE CORONER: Yes. Mr Cobb, thank you very much for that

10 and I appreciate as everyone does that for you to be

11 here has meant that you have had to relive very

12 distressing events but thank you very much for the time

13 that you have given us. It is much appreciated.

14 **A. You are welcome.**

15 THE CORONER: Thank you very much indeed.

16 Mr Underwood, I will say 2.10 then for Mr Collins.

17 Can I just indicate that I am hoping that we can go on

18 until 5.30 this afternoon. I appreciate that makes it

19 a long day. We will have a break in the middle of the

20 afternoon but unless I hear that that causes any

21 particular problem, simply because we have fallen

22 behind. I think we will have to start again at 9.30

23 tomorrow as we are finishing -- we won't be going on

24 beyond 3 o'clock tomorrow afternoon because of

25 a commitment I have. I just ask everybody to consider

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1 whether we do actually need a whole hour tomorrow as we

2 won't be going on very long after the break but we'll

3 come back to that.

4 Then Monday and Tuesday, as everybody knows we are

5 not sitting because I have a commitment at the judicial

6 college which I simply can't pass on to anybody else at

7 this notice. But I think some of that time is going to

8 have to be used in discussions with Ms Dolan just to

9 parcel up the available time because we have rather

10 overshot this week. All right. So 2.10, thank you very

11 much.

12 (1.10 pm)

13 (Luncheon Adjournment)

14 (2.10 pm)

15 THE CORONER: Yes, Mr Underwood.

16 MR UNDERWOOD: Mr Collins, please.

17 MR ANDREW COLLINS (sworn)

18 Questions from MR UNDERWOOD

19 MR UNDERWOOD: Mr Collins, as you know, my name is Underwood

20 and I am going to be asking questions on behalf of the

21 coroner and it is going to be as awkward as possible for

22 you facing me and directing answers to the coroner but

23 do your best if you will. Can you give us your full

24 names, please?

25 **A. Yes, Andrew Collins.**

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<p>1 Q. What is your employment now?</p> <p>2 <b>A. My employment now, I'm working for BP. I am the vice</b></p> <p>3 <b>president for the non-operated joint ventures in</b></p> <p>4 <b>Algeria, the BP country head and the vice president of</b></p> <p>5 <b>operations in the north Africa region.</b></p> <p>6 Q. We will elaborate on all of those in due course. Was</p> <p>7 that the situation in January 2013 as well?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. In Algeria had you worked at the In Salah JV?</p> <p>10 <b>A. Yes, I worked at the In Salah JV as the president and</b></p> <p>11 <b>the vice president between 2009 and 2011.</b></p> <p>12 Q. So were you actually situated in country?</p> <p>13 <b>A. I was situated in Algeria, yes.</b></p> <p>14 Q. And for the period after 2011 down to January 2013 were</p> <p>15 you in country or in Sunbury?</p> <p>16 <b>A. I was based in Sunbury and I also had an office in</b></p> <p>17 <b>Algiers and I would visit the sites regularly, including</b></p> <p>18 <b>In Salah and In Amenas.</b></p> <p>19 Q. When did you first visit the In Amenas plant?</p> <p>20 <b>A. After taking up my current role the first location</b></p> <p>21 <b>I went to was to In Amenas in September 2011.</b></p> <p>22 Q. In terms of corporate structure what was your</p> <p>23 relationship with Mr Cobb?</p> <p>24 <b>A. Mr Cobb, as you have heard was the, on the day of the</b></p> <p>25 <b>attack was the deputy general manager. Mr Cobb reports</b></p> <p style="text-align: center;">Page 137</p>	<p>1 Q. The relations between the three JV companies and those</p> <p>2 below them, such as subcontractors and so on, how was</p> <p>3 that done? Was there a corporate structure for the JV</p> <p>4 or not?</p> <p>5 <b>A. So the JV was an unincorporated entity which I think</b></p> <p>6 <b>I have said in my statement. However, the JV is</b></p> <p>7 <b>supposed to run as an autonomous body and part of that</b></p> <p>8 <b>autonomy that is granted to them through the PSC and the</b></p> <p>9 <b>governance framework is an ability to contract, to be</b></p> <p>10 <b>able to execute petroleum operations, which is the way</b></p> <p>11 <b>it is described in the production sharing contract.</b></p> <p>12 Q. Is that the PSC?</p> <p>13 <b>A. The PSC. So it has to be given its own freedom to be</b></p> <p>14 <b>able to operate it. It is the operator rather than the</b></p> <p>15 <b>partners being the operators. So it goes about, for</b></p> <p>16 <b>example, if it needs to get services, which is I think</b></p> <p>17 <b>your question, then it will go and go through the</b></p> <p>18 <b>process following the Algerian procurement regulations</b></p> <p>19 <b>to contract services, so it will -- it has a tender</b></p> <p>20 <b>process and then it will contract contractors in</b></p> <p>21 <b>accordance with that process. It is all governed by the</b></p> <p>22 <b>Algerian procurement regulations.</b></p> <p>23 Q. Right. And in terms of numbers of individuals on the</p> <p>24 site, we heard evidence about fluctuations for various</p> <p>25 reasons of the overall. At the time of the attack there</p> <p style="text-align: center;">Page 139</p>
<p>1 <b>through to the CdG which is the governance body for the</b></p> <p>2 <b>non-operated JVs and I am on the CdG. So strictly</b></p> <p>3 <b>speaking Mr Cobb reports to the CdG which is made up of</b></p> <p>4 <b>the three partners. Functionally inside BP Mark needs</b></p> <p>5 <b>somebody to report to inside BP in terms of, you know,</b></p> <p>6 <b>things that have to be done between employees. So</b></p> <p>7 <b>inside BP he would report to me.</b></p> <p>8 Q. So in essence he reported to you in two parallel lines;</p> <p>9 would that be fair?</p> <p>10 <b>A. The line in BP was -- there was a line there between us,</b></p> <p>11 <b>absolutely, but it was not quite the same as the line to</b></p> <p>12 <b>the CdG, which he was accountable to, if you see what</b></p> <p>13 <b>I mean.</b></p> <p>14 Q. Okay. We have heard about the CPF and the BdV and</p> <p>15 so on. Unless there is anything you want to add</p> <p>16 I gather you heard Mr Cobb's evidence, is that right?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. Is there anything you want to add to what he said about</p> <p>19 the way that the site was actually set up?</p> <p>20 <b>A. Nothing further to add.</b></p> <p>21 Q. And in terms of the legal structure, the JV, as we have</p> <p>22 had heard had the three partners and the thing was done</p> <p>23 under licence from the Algerian government, is that</p> <p>24 right?</p> <p>25 <b>A. Yes, that's right.</b></p> <p style="text-align: center;">Page 138</p>	<p>1 were about 7 or 800 people on site, is that right?</p> <p>2 <b>A. That was my understanding, yes.</b></p> <p>3 Q. Had the Compression Project been not going on at that</p> <p>4 point how different would that have been?</p> <p>5 <b>A. So as far as I know it would have probably been in the</b></p> <p>6 <b>sort of 400, maybe 500 numbers. I couldn't give you an</b></p> <p>7 <b>exact number but it would be in that order of magnitude.</b></p> <p>8 Q. Very well. In addition to the BP employees on site were</p> <p>9 there BP employees elsewhere in Algeria who had some</p> <p>10 relationship with the In Amenas site?</p> <p>11 <b>A. No, but there were BP employees at another location.</b></p> <p>12 <b>That other location is called Bourarhat which is a BP</b></p> <p>13 <b>operated appraisal site which is where they are drilling</b></p> <p>14 <b>appraisal wells but that is a BP operated site. It has</b></p> <p>15 <b>no contractual or commercial relationship with the</b></p> <p>16 <b>In Amenas JV. They just happen to be relatively close</b></p> <p>17 <b>to each other.</b></p> <p>18 THE CORONER: Also, can I interrupt for a moment. Of the 7</p> <p>19 or 800, are those all or any proportion of those expats,</p> <p>20 just so I understand?</p> <p>21 <b>A. No, I mean they're predominantly -- well multinational</b></p> <p>22 <b>but the bulk of the workforce is Algerian. On the day</b></p> <p>23 <b>of the attack to give you a sense of proportion --</b></p> <p>24 THE CORONER: Please.</p> <p>25 <b>A. -- there were about 135 expats on site out of that</b></p> <p style="text-align: center;">Page 140</p>

35 (Pages 137 to 140)

<p>1 <b>roughly 800.</b></p> <p>2 THE CORONER: Thank you very much.</p> <p>3 MR UNDERWOOD: Out of those 120 odd how many of those were</p> <p>4 directly employed by BP?</p> <p>5 <b>A. The number of BP secondees at the time out of the 135</b></p> <p>6 <b>was 18.</b></p> <p>7 Q. We have heard that of course some of those would have</p> <p>8 been employed in the production side and some were</p> <p>9 employed in what has been called liaison. Was there any</p> <p>10 other important area of work for BP employees?</p> <p>11 <b>A. So there were no secondees in liaison. No BP secondees</b></p> <p>12 <b>in liaison. But typically the BP secondees worked in</b></p> <p>13 <b>technical roles, project roles, In Amenas had I think</b></p> <p>14 <b>maybe one, maybe had a finance role down there, not</b></p> <p>15 <b>sure, probably not, so it was, you know, technical</b></p> <p>16 <b>project, production and obviously management, you know,</b></p> <p>17 <b>Mr Cobb, for example.</b></p> <p>18 Q. Right. We heard this morning of course that the</p> <p>19 liaison, some at least of the liaison employees were</p> <p>20 contracted through a company, the name of which changed</p> <p>21 over time. Was that true of all of the liaison staff</p> <p>22 then?</p> <p>23 <b>A. Yes, all the liaison, the expat liaison staff were all</b></p> <p>24 <b>from AFMC.</b></p> <p>25 Q. In terms of the Gendarmerie which is what I want to turn</p> <p style="text-align: center;">Page 141</p>	<p>1 militarised zone and there would be an overlap between</p> <p>2 the Gendarmerie and the military at that stage?</p> <p>3 <b>A. Yes, to get to the In Amenas town and the In Amenas</b></p> <p>4 <b>facilities all inside, you know, an overall zone for the</b></p> <p>5 <b>military, so yes, you're effectively travelling through</b></p> <p>6 <b>the militarised zone when you travel to the airport.</b></p> <p>7 Q. Apart from that were you aware of any overlap between</p> <p>8 Gendarmerie as it were, sphere of influence and army's</p> <p>9 sphere of influence?</p> <p>10 <b>A. Not in detail but clearly, when the Gendarmerie are the</b></p> <p>11 <b>taking people to the airport they are in the military</b></p> <p>12 <b>zone. The whole area is a militarised zone. So in that</b></p> <p>13 <b>sense it is an overlap.</b></p> <p>14 Q. The production sharing contract was I think originally</p> <p>15 between Sonatrach and Amoco, is that right?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. BP bought out the AMOCO side of it?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. And then shared that buy out with Statoil, is that</p> <p>20 right?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. Then in terms of the practical operation day-to-day, as</p> <p>23 far as you were concerned, that was the obligation of</p> <p>24 the JOB, was it?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 143</p>
<p>1 on, I am going to ask you questions which may appear to</p> <p>2 repeat what Mr Cobb said, but the purpose of this is to</p> <p>3 understand what it is that at your level was known, if</p> <p>4 you follow me.</p> <p>5 As at January 2013 what did you understand as the</p> <p>6 relationship between protection provided by the</p> <p>7 Gendarmerie on the one hand and by the Algerian Armed</p> <p>8 Forces outside on the other?</p> <p>9 <b>A. So I was clear at the day of the attack, the Gendarmerie</b></p> <p>10 <b>were protecting the zones and the site and the</b></p> <p>11 <b>facilities and the people at In Amenas and particularly</b></p> <p>12 <b>the expat population. The military covered what we call</b></p> <p>13 <b>the militarised zone and this has been talked a lot</b></p> <p>14 <b>about in the last couple of days obviously and the</b></p> <p>15 <b>military are a zone which is much larger than the site,</b></p> <p>16 <b>it goes beyond the zones which encompass the In Amenas</b></p> <p>17 <b>facility. So the military cover the zone and, the</b></p> <p>18 <b>larger zone around In Amenas in the whole hydrocarbon</b></p> <p>19 <b>region, and the Gendarme are protecting the site and the</b></p> <p>20 <b>facilities including pathways to the wells, all the</b></p> <p>21 <b>trunk lines.</b></p> <p>22 Q. What about the route to the airports? If, as we know,</p> <p>23 happened on the 13th you have a bus with armed</p> <p>24 protection going out with the Gendarmerie in the armed</p> <p>25 protection vehicles would they travel through the</p> <p style="text-align: center;">Page 142</p>	<p>1 Q. Managed by the JOC?</p> <p>2 <b>A. Yes, that's right.</b></p> <p>3 Q. And how did that fit with the CdG?</p> <p>4 <b>A. So CdGs took place three to four times every year and</b></p> <p>5 <b>the JOC were accountable to report to the CdG, sorry,</b></p> <p>6 <b>I will say CdG from now on if that's okay and they would</b></p> <p>7 <b>report to us three to four times a year on a number of</b></p> <p>8 <b>matters and we would meet face-to-face in Algiers in the</b></p> <p>9 <b>capital of Algeria and we would spend a day together</b></p> <p>10 <b>going through matters involved with the JV's activities</b></p> <p>11 <b>and so we did that three to four times a year.</b></p> <p>12 Q. Was the JOC simply reporting up or did the CdG have</p> <p>13 other roles as well?</p> <p>14 <b>A. The JOC was reporting up. The CdG didn't have any other</b></p> <p>15 <b>responsibilities outside of the JV.</b></p> <p>16 Q. And have I understood this right: the JOC level was</p> <p>17 staffed by people like Mr Cobb?</p> <p>18 <b>A. Yes, that's right, yes.</b></p> <p>19 Q. How was the CdG staffed?</p> <p>20 <b>A. So the CdG is something which is quite formal and there</b></p> <p>21 <b>are many of them and all the associations have them and</b></p> <p>22 <b>in the production sharing contract it actually</b></p> <p>23 <b>determines who will be on the CdG. So in In Amenas's</b></p> <p>24 <b>instance, for everyone's clarity, there were three</b></p> <p>25 <b>Sonatrach members mandated in the PSC and three members</b></p> <p style="text-align: center;">Page 144</p>

36 (Pages 141 to 144)

1 that were available to what they called the contractor  
 2 in the contract, in other words, the foreign partner.  
 3 And the three positions were then divided between BP and  
 4 Statoil.  
 5 So that group of six people would meet with the JOC.  
 6 Just to add, the CdG also, companies could invite what  
 7 we called experts to that forum, so you would see not  
 8 just six people, you would see several other people  
 9 perhaps from Sonatrach, perhaps from Statoil or perhaps  
 10 from BP.  
 11 Q. But apart from that expert assistance you would have an  
 12 even number of people on the CdG do you?  
 13 A. That's correct, yes.  
 14 Q. And in practical terms did that work out by way of  
 15 consensus or were there power blocs or what?  
 16 A. In practical terms it was -- everything was done by  
 17 consensus.  
 18 Q. I want to move on to security arrangements at and around  
 19 the site. Again, there may be a repetition with what  
 20 Mr Cobb was asked. Again it is for the purpose of  
 21 asking you what your understanding was at your more, as  
 22 it were, elevated level.  
 23 Were you aware that the Algerian military had a camp  
 24 in In Amenas town?  
 25 A. Yes.

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1 Q. What did you understand that consisted of in terms of  
 2 numbers of troops and so on?  
 3 A. My recollection of the day of the attack, it was  
 4 something around about a thousand man camp at In Amenas  
 5 with --  
 6 Q. I am sorry?  
 7 A. Well, with, you know, associated hardware and that  
 8 a thousand man camp would have.  
 9 Q. Let us talk about the hardware a bit. Just how  
 10 heavyweight was the hardware that you understood them to  
 11 have?  
 12 A. I'm not a security expert so I didn't -- I wouldn't know  
 13 how to judge the weight. But I have seen, you know,  
 14 military helicopters at the airport, for example, and my  
 15 security manager had told me, you know, they would have  
 16 tanks and certain things, but because I'm not a security  
 17 expert very quickly I sort of can't recall exactly what,  
 18 you know, what those individual pieces of equipment  
 19 were.  
 20 Q. But they weren't restricted just to infantry as far as  
 21 you were aware?  
 22 A. That's my understanding, yes.  
 23 Q. And -- I am sure we have all been hearing about the  
 24 revolution in Libya, if it isn't in our minds, in 2011.  
 25 Were you conscious of any change in the army presence as

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1 a result of that?  
 2 A. As far as I was aware I visited three times before the  
 3 attack and I did not see, you know, I didn't actually  
 4 myself see a physical change in presence of the military  
 5 during those times before the attack.  
 6 Q. Was any change reported to you?  
 7 A. Well, there were many reports of border reinforcements  
 8 during the period before the attack which were reported  
 9 to me which were validated, verified and so forth by our  
 10 security professionals. So that's how the information  
 11 came to me.  
 12 Q. Again, in terms of practicalities, did the CdG meet at  
 13 In Amenas?  
 14 A. No, the CdG used to meet in Algiers.  
 15 Q. So the three or four visits that you had to the site,  
 16 was it three or four did you say?  
 17 A. Before the attack I visited three times.  
 18 Q. So they were separate from CdG meetings then it follows?  
 19 A. Yes.  
 20 Q. Did you have any other discussions outside of the CdG  
 21 with, for example, director of security or anybody like  
 22 that about the general security situation?  
 23 A. Yes, we used to talk about it constantly. So the  
 24 business security manager for Algeria that I will refer  
 25 to is someone that works for BP. They are not in the

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1 JV.  
 2 Q. Was that Barry Shaw?  
 3 A. Yes. So he works inside BP. Not inside the JV. So  
 4 there would be lots of conversations. There would also  
 5 be lots of conversations with Mark, so even though --  
 6 Mark Cobb, so even though Mark is on the JOC and he  
 7 reports to the CdG he wasn't therefore, somehow blocked  
 8 from talking to me.  
 9 So there would be many conversations and those  
 10 included security.  
 11 Q. Moving on to the Gendarmerie. What was your  
 12 understanding about the training, ability et cetera, if  
 13 you see what I mean, of the Gendarmerie versus the army?  
 14 A. Again, not a security expert so I don't know the  
 15 difference between the training of the Gendarmerie  
 16 versus the training of the military to be honest.  
 17 I don't know the difference. They are different groups.  
 18 Algeria has different types of guarding forces, military  
 19 Gendarme, police and so forth. I don't know the  
 20 difference between, in terms of the training, I am  
 21 sorry.  
 22 Q. Did you know whether the Gendarmes were conscripts?  
 23 A. My understanding is that they were not conscripts.  
 24 Q. Did you have any idea about their strength, if you like,  
 25 in the project area?

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<p>1 <b>A. Well, yes in terms of there were a large number of them</b>  2 <b>which has been described before so there were 160 at the</b>  3 <b>BdV and CPF and they were deployed also to the rig</b>  4 <b>sites, so there were 30 at one of the rigs and 30 at</b>  5 <b>another rig, so in terms of their strength of numbers</b>  6 <b>I understood that.</b>  7 Q. In terms of your own observation on the three occasions  8 you visited did you see them patrolling or --  9 <b>A. Yes, we used to -- obviously when I was there, you know,</b>  10 <b>I wanted to see as much as possible and we used to</b>  11 <b>actually go out and look at construction and look at the</b>  12 <b>plant and -- so that would take us out and I actually</b>  13 <b>have seen the Gendarmerie out in what are the zones</b>  14 <b>doing, you know, what the Gendarmes do. They patrol.</b>  15 Q. Were you conscious that in various sites there were  16 different approaches towards whether the Gendarmes would  17 be protecting or the army would be protecting?  18 <b>A. Sorry, when you say different sites?</b>  19 Q. Sorry, I didn't mean different parts of the In Amenas  20 site. I mean between different projects?  21 <b>A. Sorry, can you repeat the question?</b>  22 Q. Yes. We know here the Gendarmerie provided the  23 protection in the area, if you like, and the military  24 outside in the militarised zone. Was that always the  25 case in --</p> <p style="text-align: center;">Page 149</p>	<p>1 <b>the same question, was that they, there were some</b>  2 <b>complaints that the guards were not carrying out the</b>  3 <b>morning check on the vehicle as thoroughly as they were</b>  4 <b>in the past. So before a vehicle, anyone gets in</b>  5 <b>a vehicle it needs to be checked every day and they have</b>  6 <b>to go through certain things, they look at the tires,</b>  7 <b>look at brakes, make sure it's got enough provisions and</b>  8 <b>so forth. And I just remember Mark saying there were</b>  9 <b>some complaints that some of those checks were not quite</b>  10 <b>going so well.</b>  11 <b>And we discussed that. He said they were, he was</b>  12 <b>raising it with his counterpart and he said, you know,</b>  13 <b>that "we will make these things workable and get through</b>  14 <b>them." They were not material is my -- the way I left</b>  15 <b>that conversation.</b>  16 Q. I want to move on to the question of whether guards  17 could or should have been armed. I think you are  18 conscious that there is a security management plan which  19 gives as a reason for not arming guards, cost. Was that  20 a factor so far as you are concerned?  21 <b>A. So I have been shown a document which refers to cost.</b>  22 <b>That is not the reason that civil armed guards were</b>  23 <b>generally not favoured in In Amenas. That is -- I have</b>  24 <b>seen that report but that is ...</b>  25 Q. How many other sites were you responsible for?</p> <p style="text-align: center;">Page 151</p>
<p>1 <b>A. In other locations?</b>  2 Q. Exactly.  3 <b>A. So I don't know how they did their, you know, protection</b>  4 <b>of the assets and the people in other locations.</b>  5 Q. Moving on to internal security. We have heard about the  6 SSI. Is that Le Service de Sureté Interne?  7 <b>A. Yes.</b>  8 Q. And were you conscious of the changeover by which the  9 SSI took over the internal guarding?  10 <b>A. Yes, I was.</b>  11 Q. Were you in touch with concerns that were expressed  12 about that?  13 <b>A. So I was -- I would talk to Mark and we -- he used to</b>  14 <b>explain what was going on and the process that was going</b>  15 <b>on. So I was aware of what were described to me as</b>  16 <b>"teething problems" with the handover from, you know,</b>  17 <b>a previous organisation to a new organisation, albeit</b>  18 <b>the fact that they were the same people, so I was aware</b>  19 <b>of some teething problems, and I think the examples were</b>  20 <b>around things like vehicle checks and so forth, that</b>  21 <b>type of thing.</b>  22 Q. Can you help us about that? Can you give any specific  23 recollection of what sort of teething problem there may  24 have been about vehicle checks?  25 <b>A. I think the one that I remember was, when I asked Mark</b></p> <p style="text-align: center;">Page 150</p>	<p>1 <b>A. Well, I was responsible representing BP in the other JV,</b>  2 <b>which was In Salah.</b>  3 Q. Did they have armed guards there?  4 <b>A. No, they didn't have armed guards there.</b>  5 Q. Do you have any experience of guards internal to a  6 hydrocarbon site being armed?  7 <b>A. No.</b>  8 Q. Is that an industry-wide reaction or is that restricted  9 to BP and those sites that BP is involved in?  10 <b>A. I mean, I couldn't speak for the whole industry but --</b>  11 Q. To your knowledge?  12 <b>A. You know, I think the arming of guards is done on</b>  13 <b>probably a case-by-case basis based around risk and</b>  14 <b>needs and that's my understanding of how it was. So</b>  15 <b>it's not, you know, you could go to a different country</b>  16 <b>and you would find a different situation.</b>  17 Q. Moving on to the liaison team. As you told us they were  18 employed by an independent contractor. Was that  19 therefore something which might have provided distance  20 between the JV and the liaison team or was there a close  21 working relationship?  22 <b>A. So the JV in order to get specialist service -- so</b>  23 <b>I don't think it made any distance just to be clear.</b>  24 <b>The liaison team were an inherent part of the JV, but</b>  25 <b>the JV needed to get specialist services and it went to</b></p> <p style="text-align: center;">Page 152</p>

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1 **specialist companies to do that.**  
 2 Q. Did you have confidence in it?  
 3 **A. Yes, yes, absolutely.**  
 4 Q. Did you have any personal dealings with them or was this  
 5 reported back via people like Mr Cobb?  
 6 **A. So formally it was reported back through Mr Cobb but**  
 7 **clearly I went to site and you would have conversations**  
 8 **with people and you develop a sort of working**  
 9 **relationship with people, so I would ask them questions**  
 10 **so that, you know, like any good leader would do he**  
 11 **would check that things were in reasonable shape below**  
 12 **the level of management that's reporting to them, so**  
 13 **I would talk to the liaison people. I know several**  
 14 **liaison people.**  
 15 Q. We know that the liaison team would report to the JOC  
 16 and that was then reported back up, was it?  
 17 **A. Yes, that's right. So the liaison team would report to**  
 18 **the JOC and then it would be reported onwards from there**  
 19 **if necessary.**  
 20 Q. Mr Cobb was taken to a number of documents, security  
 21 risk assessments, security management plan and security  
 22 briefing documents. Did they come to your attention?  
 23 **A. The JV documents?**  
 24 Q. Yes.  
 25 **A. No.**

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1 Q. Again, just in terms of structure then, this was  
 2 something at JOC level, was it?  
 3 **A. Yes.**  
 4 Q. Was security a CdG issue?  
 5 **A. It didn't come up as a CdG issue during the time before**  
 6 **the attack and the time when I was a member of the CdG,**  
 7 **it never came up. But, you know, it could come up, so**  
 8 **the CdG is not restricted from not having that as**  
 9 **a point of discussion, so -- but it did not specifically**  
 10 **come up as a topic that would make it on to the agenda**  
 11 **of the CdG.**  
 12 Q. What would have happened if there had been a security  
 13 concern at JOC level? Is that something that ought to  
 14 have been brought to the CdG's attention?  
 15 **A. Yes, the JOC has got the autonomy, if you like, to**  
 16 **actually raise something to the CdG to be discussed.**  
 17 **Absolutely. There is no restrictions on the JOC in that**  
 18 **matter. Equally, the CdG could reverse that and ask the**  
 19 **JOC.**  
 20 Q. I want to move on now to BP's interplay with the JV if  
 21 I may.  
 22 Did BP have liaison team members in its Algiers  
 23 office?  
 24 **A. Yes, it did.**  
 25 Q. What was their role?

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1 **A. So their role was to basically look after any of the**  
 2 **visitors that were coming to the Algiers office. So**  
 3 **I have an office in Algiers, we do business in Algiers,**  
 4 **we have meetings in Algiers. So when people are coming**  
 5 **into Algiers they also need the type of escort and care**  
 6 **and protection that you would have in the JV, so we also**  
 7 **have two liaison supervisors in Algiers.**  
 8 Q. Did they have any intelligence gathering function, and  
 9 I don't mean secret intelligence, I just mean getting  
 10 what is in this public domain available to BP?  
 11 **A. Yes, so there were two liaison supervisors in Algiers**  
 12 **and a liaison manager so they would report up to**  
 13 **a liaison manager and they reported to the security**  
 14 **manager for Algeria. They indeed had, part of their**  
 15 **role was to gather intelligence locally and regionally**  
 16 **and pull that information together to assist in our**  
 17 **constant risk analysis and monitoring of the situation**  
 18 **in Algeria.**  
 19 Q. So we have BP in its role as a partner in the JV which  
 20 has the security liaison -- whatever you want to call  
 21 it --  
 22 **A. Yes.**  
 23 Q. -- team on the ground there. And BP in Algiers getting  
 24 intelligence. Was there any to and fro between those  
 25 two?

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1 **A. Yes, absolutely. So there was a constant flow of**  
 2 **information between the two. Indeed, we used to pull**  
 3 **together a, just to give by way of example, weekly**  
 4 **summary of information that was open source information,**  
 5 **information that was in the public domain, information**  
 6 **that was coming from the media sources, from a sort of**  
 7 **spectrum, a balance of pro and antigovernment and they**  
 8 **would pull that together and that would be looked at by**  
 9 **the security manager, make sure that was sort of a fair**  
 10 **assessment and that would be shared with the JVs.**  
 11 **I would add further that actual mechanism was**  
 12 **underpinned by BP's intelligence and analysis unit which**  
 13 **was based back in London. So it had further support for**  
 14 **the content of those reports. And that would be fed to**  
 15 **the JVs every week.**  
 16 Q. And the London based unit, would that carry out  
 17 a similar sort of intelligence gathering process but on  
 18 a wider scale?  
 19 **A. Yes, so they had a number of service arrangements with**  
 20 **a broad set of security agency companies who would**  
 21 **provide information and consolidate it, validate it and**  
 22 **that information was available as well. So the team,**  
 23 **the Algiers team had that support as well.**  
 24 Q. I am not asking you to give expert evidence on this but  
 25 merely to give your impression so that everybody gets an

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1 idea of what your stance was on this. Was it your  
 2 impression that the open source intelligence about the  
 3 security situation was consistent and straightforward  
 4 and all credible or it was fragmentary or it was  
 5 incredible or what?  
 6 **A. The first thing is I used to be and continue to be very  
 7 impressed with the information they pulled together.  
 8 That's the first thing I'd say. They were aware that  
 9 some information would be not possible to validate and  
 10 that some information would be recirculated information  
 11 by the media, by various sources. They tried their best  
 12 to identify those so that they didn't give off, you  
 13 know, false signals. But at the same time they also  
 14 wanted to let people know, you know, what was out there,  
 15 what was being said. So I mean, I was -- I continue to  
 16 be impressed by the level of information, the reach they  
 17 had and the fact that it was very open.**  
 18 Q. And Mr Shaw, BP's director of security in the north  
 19 Africa region, what was his function?  
 20 **A. His function was to have oversight of security for BP in  
 21 the north Africa region which at the time was Algeria  
 22 and Libya. So he was responsible for pulling together  
 23 and coordinating and managing the risk assessment  
 24 process for example in terms of security. For making  
 25 sure that the security management plans were -- existed**

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1 and were updated and any actions that needed to be  
 2 followed through he would track them and he also had  
 3 a role to go and see, so he would go and see, you know,  
 4 what was actually going on in the fields where BP had an  
 5 interest in Algeria.  
 6 Q. How regularly were you in touch with him in 2011 through  
 7 to 2013?  
 8 **A. Probably, if not every day every other day.**  
 9 Q. Did you have dealings personally with people from other  
 10 hydrocarbon companies?  
 11 **A. So, yes, I used to meet with my peers in Algeria, so  
 12 there were a number of companies in Algeria and we used  
 13 to meet to discuss, you know, what was going on in their  
 14 particular world and so we used to -- we would have  
 15 informal meetings and telephone calls and then we used  
 16 to have formal meetings and we met again three times  
 17 before the actual attack in In Amenas. There were  
 18 something like nine or ten of us representing nine or  
 19 ten different companies in different locations around  
 20 Algeria. And we would meet and discuss.**  
 21 Q. What was the degree of information sharing about the  
 22 security situation?  
 23 **A. So the -- effectively the main reason for meeting was to  
 24 talk about security. We also used to just talk about  
 25 business in general but we were very, very shy about**

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1 **talking about business in general for confidentiality  
 2 reasons and so we were all very strict about not talking  
 3 about -- but we did like to talk about security to get  
 4 some sort of independent and different points of  
 5 triangulation on what was going on. So we used to talk  
 6 about security every single meeting.**  
 7 Q. Was there a bi-annual security review process for  
 8 Algeria within BP north Africa?  
 9 **A. Yes, there was.**  
 10 Q. And were you involved in those?  
 11 **A. I was, yes.**  
 12 Q. In 2012?  
 13 **A. In 2012, yes.**  
 14 Q. You have told us then about the various ways in which  
 15 you were involved in sharing, gathering, understanding  
 16 information around the security situation. Down  
 17 to January 2013 was there anything in any of that that  
 18 spiked, if you like, that caused you particular concern?  
 19 **A. I think -- yes, it's fair to say that we constantly  
 20 looked at the region and Libya is next door to Algeria,  
 21 lost its government, lost its leader and was in  
 22 difficulty. So you know, that was something that was  
 23 discussed. A land with no government, no structure, no  
 24 hierarchy, no controls and then we would also look at  
 25 countries like Mali as well where there was attempts to**

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1 **break the country up into a north and south. So we  
 2 would talk about those types of things and I would say  
 3 that that is probably the thing that we were aware of.**  
 4 Q. Were you also conscious of various attacks that there  
 5 were in and around southern Algeria?  
 6 **A. Yes, so we used to constantly monitor the events going  
 7 on and we used to at the bi-annual, we used to look at  
 8 it all the time anyway, day-to-day, week to week, month  
 9 to month but particularly at the bi-annual we would take  
 10 a pause and step back from, you know, the daily  
 11 situation and we would bring in people from outside of  
 12 our region to act as a bit of a challenge and we would  
 13 look at what was going on in the region and play that  
 14 into our position in country and that was done --**  
 15 Q. How did that work?  
 16 **A. So we'd have a meeting and we would invite people from  
 17 different parts of BP into that meeting when we were  
 18 talking about the security position. So you know,  
 19 people who were not from this particular north Africa  
 20 region we would invite them in from group security.**  
 21 Q. I take it then you were aware of the Weatherford rig  
 22 attack, were you, in 2011?  
 23 **A. I was made aware of it, yes.**  
 24 Q. And the kidnapping of the Wali in the local area, the  
 25 Illizi area?

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<p>1 <b>A. Yes, I was aware of the Wali kidnapping.</b>  2 Q. Weapons caches near In Amenas being found in 2012?  3 <b>A. I was aware of the report of the weapons cache. I say</b>  4 <b>that because we tried to validate that particular report</b>  5 <b>of the arms cache and we were unable to. We checked</b>  6 <b>that out specifically through the UK embassy in Algiers,</b>  7 <b>through the security function and the defence attache</b>  8 <b>but we were not able to get confirmation and I think</b>  9 <b>the -- to the point where even the ambassador got</b>  10 <b>a written assurance that that could not be confirmed, so</b>  11 <b>I was aware of the report of that, but ...</b>  12 Q. Were you aware of the suicide bombing at Tamanrassat?  13 <b>A. Yes, Tamanrassat, yes, I was aware of that. That was</b>  14 <b>in March 2012 I think.</b>  15 Q. Were those various incidents factored into the bi-annual  16 reviews?  17 <b>A. Absolutely, yes. Yes, we would talk about all of those.</b>  18 Q. I think you have been shown for the purposes of this  19 inquest an English translation of a newspaper report,  20 apparently from the El Khabbar newspaper. Had you seen  21 that at the time?  22 <b>A. No, I didn't see that article.</b>  23 Q. So as at January 2013 then were you comfortable with the  24 security assessments that you knew to exist?  25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 161</p>	<p>1 supervised by the Gendarme to the -- where the hunger  2 strikers allegedly were. I don't know, I didn't see  3 them. And they were able to visit them and then they  4 left the site under the supervision of the Gendarme.  5 That is how it was described to me.  6 Q. Again, just to get the idea of the relationship between  7 those on the ground and those in Sunbury. Would you  8 have expected to have been given more detail about that?  9 <b>A. I think Mark was -- yes, I would have liked to have</b>  10 <b>known, you know, how did that occur? Mark was sort of</b>  11 <b>following up on that but we never got the chance to</b>  12 <b>finish that follow up.</b>  13 Q. Was that situation persisting or had it concluded  14 by January?  15 <b>A. By the day of the attack the strike had finished, so,</b>  16 <b>yes, the strike had finished.</b>  17 Q. We have heard of course from Mr Cobb, and you saw his  18 evidence this morning, about the efforts he and Statoil  19 took to, as it were, mediate in the strike and you heard  20 his evidence about the relations between BP and Statoil  21 on the one hand and the strikers on the other. What was  22 your experience if any of the way in which the relations  23 went during the strike?  24 <b>A. My -- so -- this was a difficult time for Sonatrach.</b>  25 <b>They were trying to implement something and it was</b></p> <p style="text-align: center;">Page 163</p>
<p>1 Q. Were you comfortable visiting the site yourself?  2 <b>A. Yes.</b>  3 Q. Apart from the teething problems with SSI were you  4 conscious of any difficulties at all for security that  5 troubled you?  6 <b>A. Not that troubled me materially.</b>  7 Q. I want to move on to the strike. If I understand this  8 right, the strike originated with not just the drivers  9 but also IT staff?  10 <b>A. That's right, yes.</b>  11 Q. Did the IT staff go back earlier than the drivers?  12 <b>A. In my recollection, yes.</b>  13 Q. And some of the drivers went on hunger strike; is that  14 right?  15 <b>A. Yes.</b>  16 Q. Associated with that, with the hunger strike, was  17 a situation by which relatives of the strikers came and,  18 as it were, set up camp on site; is that right?  19 <b>A. So I was told that there were some families who came to</b>  20 <b>visit the hunger strikers. I wouldn't describe it as</b>  21 <b>setting up camp. So this came to me, I believe it came</b>  22 <b>through Mark. I also think Mark was not there at the</b>  23 <b>time as well and that was my recollection. So it was</b>  24 <b>described to him that some family members did appear and</b>  25 <b>wanted to visit the hunger strikers. But they were</b></p> <p style="text-align: center;">Page 162</p>	<p>1 <b>floundering. So they were very frustrated. There were</b>  2 <b>some sociopolitical things going on in the country as</b>  3 <b>well which were sort of creating a dynamic, people in</b>  4 <b>the south wanting to have jobs and jobs that had more</b>  5 <b>than just a three to four month renewable contract. So</b>  6 <b>they wanted to have a job with Sonatrach, you know,</b>  7 <b>a job for life, security, all the things that come with</b>  8 <b>working for a national company.</b>  9 <b>Sonatrach wasn't, you know, particularly attracted</b>  10 <b>to that idea. So it was a very difficult time for</b>  11 <b>Sonatrach. They wanted to try and solve it but they</b>  12 <b>were struggling to solve it and it was creating, you</b>  13 <b>know, concern on the site. So my reflections on it, a</b>  14 <b>very difficult time for Sonatrach. I talked to my</b>  15 <b>counterpart in Algiers about it. I tried to empathise</b>  16 <b>because it was a national, it was an Algerian problem.</b>  17 <b>He politely asked me to not get involved because it was</b>  18 <b>a national matter with national employees. And</b>  19 <b>I politely, you know, said, okay, but you know, it is</b>  20 <b>affecting the business and the people and the morale and</b>  21 <b>the productivity of individuals. So I said you know,</b>  22 <b>I have to raise it. So, am I giving you a picture?</b>  23 Q. Yes, thank you. So I don't want to put words into your  24 mouth but would it be fair to say this was, if you like,  25 one of the focal points of conflict, sociopolitical</p> <p style="text-align: center;">Page 164</p>

1 conflict as you put it between the government and  
 2 Tuareg?  
 3 **A. You could portray it like that, yes.**  
 4 Q. Your concern of course, as we have seen from an email  
 5 that Mr Cobb took the coroner to, was it meant that you  
 6 were not going to have drivers to provide the security  
 7 escort and that obviously posed practical problems for  
 8 the site?  
 9 **A. Yes.**  
 10 Q. Did it ring any other alarm bells for the potential to  
 11 escalate?  
 12 **A. Not at the time, no. So I was clear that -- what Tore**  
 13 **sent to us and you know by the time Tore had sent this**  
 14 **email there had been lots of conversations about this**  
 15 **because everyone was trying to solve the problem,**  
 16 **everyone to meet in the middle so the drivers would feel**  
 17 **they could return to work. But it was clear that the**  
 18 **issue was an industrial dispute. It was purely inside**  
 19 **the boundary of an industrial dispute, so you know, the**  
 20 **escalation potential was as Tore wrote in his email,**  
 21 **that at some point the activities on the site may have**  
 22 **to stop because there just wouldn't be enough support**  
 23 **people, ie the drivers to continue going.**  
 24 **So you know, that was the space in which this was**  
 25 **discussed and talked about. It was stopping operational**  
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1 activity. So there was definitely potential to escalate  
 2 but it was all inside the functioning of the JV.  
 3 Q. Did the fact that it escalated to a hunger strike  
 4 trouble you?  
 5 **A. Yes, we did talk about that a lot. I mean, it**  
 6 **happened -- the hunger strike happened at a very, very**  
 7 **late stage of the strike. Just to try and give the**  
 8 **context, the strike used to ebb and flow. So you know,**  
 9 **one week it would be it's going to be solved this**  
 10 **weekend, it's going to be okay and then the next weekend**  
 11 **would arrive and it would go back weeks. So there was**  
 12 **always these, it's going to be solved, it's not going to**  
 13 **be solved. By the time we got to close to, or the rough**  
 14 **time when the hunger strikers, everybody felt it was**  
 15 **definitely going to get solved, and then some people**  
 16 **started to go on hunger strike. So, you know,**  
 17 **perhaps -- but I don't know why they decided to go on**  
 18 **hunger strike but they did.**  
 19 **So that was right towards the end. So there was**  
 20 **discussion. Also I mean, I do know that in terms of**  
 21 **people's concern I know for example Tore and it's either**  
 22 **Fitz or Paul, I can't remember which one -- because one**  
 23 **of the hunger strikers was taken to hospital so that was**  
 24 **another sort of thing that concerned us because we were**  
 25 **concerned about the welfare of a person. So yes, we**  
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1 **talked about it. Yes, we were concerned. Yes, we tried**  
 2 **to constantly encourage two sides to find a solution.**  
 3 Q. Do you know about the contention that at the meeting of  
 4 the day before, the 15th, that Mr Cobb attended with the  
 5 strikers that a threat was made?  
 6 **A. I wasn't aware of that on 16 January.**  
 7 Q. No, are you aware of it now?  
 8 **A. I'm aware of it now.**  
 9 Q. How does that strike you in terms of its relationship  
 10 with your understanding of the way in which BP was  
 11 getting on with the strikers?  
 12 **A. Well, I mean, it's an allegation isn't it? I don't know**  
 13 **whether it has been -- as far as I know it's --**  
 14 Q. We haven't heard from the witness yet.  
 15 **A. No, no, so --**  
 16 Q. It is a matter for the coroner when he does hear.  
 17 **A. It's obviously shocking what was said, if it was said.**  
 18 **And I know if people had known that that's what had been**  
 19 **said then people would have raised it to the appropriate**  
 20 **people. So what do I think? Shocking that that would**  
 21 **have been said.**  
 22 THE CORONER: So when you say people would have raised it to  
 23 the appropriate people, who would they be?  
 24 **A. So, for example, fear of sort of reiterating what Mark**  
 25 **said earlier on, you know, he would have gone to the**  
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1 **Gendarme captain and talked to that. Mark would have**  
 2 **probably contacted me and explained that he'd heard**  
 3 **something, you know, shocking. He would have talked to,**  
 4 **of course I'm speculating, but you know, Mark would have**  
 5 **talked to Lotfi Benadouda who was the general manager**  
 6 **and they would have raised it up in Sonatrach. It would**  
 7 **not have been taken lightly at all is my speculation on**  
 8 **that particular matter.**  
 9 MR UNDERWOOD: One of the questions that may be important or  
 10 may not be in the end is the timing of this attack and  
 11 who was on site at the time it happened. Can I just ask  
 12 you some questions about the ebb and flow of staff?  
 13 **A. Yes.**  
 14 Q. So we know from the email that we have just been talking  
 15 about that there was a demanning of the site, I think  
 16 the words were used, in order to cater for the  
 17 possibility that there simply wouldn't be drivers to  
 18 deal with this and that therefore the numbers of expats  
 19 went down in late 2012?  
 20 **A. Yes, that's right.**  
 21 Q. Then that was reversed, was it?  
 22 **A. So when the -- so you are absolutely correct, there was**  
 23 **a temporary demobilisation of staff around about**  
 24 **the September/October timeframe and then -- but when the**  
 25 **strike was over, which was in mid December, then there**  
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1 was a decision to start to remobilise people. That was  
 2 just before Christmas/New Year and so there was a bit of  
 3 a pause during that period and then in January the  
 4 remobilisation continued.

5 Q. The continuation in January when people started manning  
 6 up again, if you like, would that have been known in  
 7 advance generally around the site?

8 A. Some people would have known the detail, certainly  
 9 liaison, the logistics people would have to have some  
 10 knowledge of that, but the rest of the people I don't  
 11 know. By normal business they wouldn't know that.

12 Q. And was this just a function of when the flights were  
 13 available according to how many people came back  
 14 during January?

15 A. Yes.

16 Q. You know I think also that there was an occasion in late  
 17 2012 when one or more armed Gendarme is said to have  
 18 gone inside the CPF perimeter. Were you aware of that?

19 A. I was aware of that alleged report. However, I cannot  
 20 quite recall whether I was informed before or after the  
 21 attack. I just -- you know, I struggle to remember when  
 22 that was.

23 Q. The final matter I want to ask you about is whether when  
 24 the, as it were, remobilisation occurred around the end  
 25 of 2012, beginning of 2013 there was any particular risk

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1 assessment which was carried out?

2 A. So -- yes, there was, the site decided that they needed  
 3 to carry out a sort of pre-mobilisation risk assessment  
 4 and they -- I was informed that that's what they were  
 5 doing.

6 Q. Were you aware there were any problems arising out of  
 7 it?

8 A. I was not made aware of any problems.

9 MR UNDERWOOD: That's all I want to ask you about your role  
 10 in the organisations, if you like and about the security  
 11 situation as you understood it. Obviously there are  
 12 other matters that you are going to deal with in due  
 13 course. But for this part of your evidence that's all  
 14 I want to ask and no doubt you will be asked some  
 15 questions by others.

16 THE CORONER: Can you just help me with two things before we  
 17 go on. The first was this: you said that the question  
 18 of, have I got this right, the question of armed civil  
 19 guards would be something to look at it on  
 20 a case-by-case basis. Did I understand that right?

21 A. I think when Mr Underwood asked me, he asked me a very  
 22 broad question, is that something across the industry?  
 23 So you know, in other countries, the case may be  
 24 different. If a country has no civilian authorities  
 25 with strong command structures and so on and so forth,

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1 you know, that country might deem that it needs to do  
 2 something such as putting civil armed guards in. I'm  
 3 talking hypothetically. That is what I was trying to  
 4 say. I would say in Algeria's case you don't have that.  
 5 You have a country which has got strong authorities in  
 6 the form of its Gendarmerie and its military and,  
 7 therefore, it doesn't rely upon the -- or have the need  
 8 to rely upon the presence of civilian armed guards.

9 THE CORONER: So, for example, no consideration was given,  
 10 would this follow, as to whether you might have armed  
 11 civil guards, for example at entry or exit points at  
 12 In Amenas, but for the reason you have given?

13 A. So -- yes, the principle is that at In Amenas it had 160  
 14 Gendarmes who were there to protect the people. It was,  
 15 it's the law in Algeria that you must have armed  
 16 protection for expats. And the Gendarmerie are placed  
 17 and equipped and trained and have the skills to protect  
 18 that facility.

19 THE CORONER: Then just the other thing I want to ask you  
 20 about at this stage was something that was raised by  
 21 Sebastian John's wife and mother and it's this: I just  
 22 want your help about this. Was In Amenas a particularly  
 23 challenging posting for a relative newcomer, and by that  
 24 I'm really asking, was it too challenging because of the  
 25 security situation? Can you help us, what do you say to

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1 the question of whether it would for example have been  
 2 more appropriate to have kept a destination or a posting  
 3 like that for more experienced employees?

4 A. Well, the In Amenas site was a safe place for people to  
 5 earn work. It was risk assessed to be like that. So  
 6 the matching up of roles for people like Sebastian, it  
 7 doesn't sort of say, well, you know, that place is not  
 8 safe, so he can't go there because if it's not safe  
 9 nobody could work there. So In Amenas, you know, on the  
 10 16th January was considered to be secure and safe and so  
 11 there was no reason to prevent Sebastian from having  
 12 that opportunity.

13 So when the selection of roles is taken it doesn't  
 14 say this person has limited experience and therefore and  
 15 that place is not a secure place to work, because if  
 16 that's not a secure place to work nobody works there.

17 THE CORONER: You may or may not be asked more about that.  
 18 Thank you very much.

19 Questions from MR RITCHIE

20 MR RITCHIE: Mr Collins, I am Andrew Ritchie and I appear on  
 21 behalf of the family of Carlos Estrada.  
 22 Between November 2009 and August 2011 you were  
 23 seconded to In Salah, weren't you?

24 A. Yes.

25 Q. And you visited there during that time, did not you?

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<p>1 <b>A. Yes.</b></p> <p>2 Q. How often?</p> <p>3 <b>A. Well, during the period between 2009 and 2011 I actually</b></p> <p>4 <b>worked in the In Salah JV so I would visit there every</b></p> <p>5 <b>month during that period.</b></p> <p>6 Q. Is it correct that the BdV had a fortified front gate</p> <p>7 during your time there, with a holding area?</p> <p>8 <b>A. During my time at the BdV there were some improvements</b></p> <p>9 <b>taking place at the In Salah JV and -- but there was</b></p> <p>10 <b>a fortified or chicane type of arrangement at the BdV</b></p> <p>11 <b>from my memory.</b></p> <p>12 Q. I said fortified front gate. I did not say chicane.</p> <p>13 <b>A. Can you define the fortified gate?</b></p> <p>14 Q. Not a wire mesh slider or a metal pole. More fortified</p> <p>15 than a wire mesh sliding gate, a fortified gate?</p> <p>16 <b>A. I can't recall -- it was a sliding gate but I can't</b></p> <p>17 <b>recall the style of gate.</b></p> <p>18 Q. Is it correct that there was a secure holding area at</p> <p>19 In Salah? In other words, once you're through the gate</p> <p>20 you are into a secure holding area before you go into</p> <p>21 the camp at the BdV?</p> <p>22 <b>A. There was -- you mean a holding area for people?</b></p> <p>23 THE CORONER: Do you mean for people and vehicles so you are</p> <p>24 not completely through?</p> <p>25 MR RITCHIE: I mean precisely that, sir. So once you are</p> <p style="text-align: center;">Page 173</p>	<p>1 <b>A. Yes, so the BP/Statoil/Sonatrach JV, yes.</b></p> <p>2 Q. For that compound, the BP compound, not the larger</p> <p>3 compound within which it is situated, was there a heavy</p> <p>4 duty gate?</p> <p>5 <b>A. Yes, there was.</b></p> <p>6 Q. Is the BP compound in fact a walled compound with solid</p> <p>7 walls?</p> <p>8 <b>A. There was a solid wall around the -- and there is</b></p> <p>9 <b>a solid wall around the JV compound at Hassi Messaoud,</b></p> <p>10 <b>yes.</b></p> <p>11 Q. With either razor or barbed wire on top of it?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Is that compound situated within a larger compound?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. Is that larger compound surrounded by iron or steel or</p> <p>16 metal reinforced railings in cement bases?</p> <p>17 <b>A. As far as I know, yes.</b></p> <p>18 Q. Is there a guardhouse at the entrance to the larger</p> <p>19 compound with men with guns in it?</p> <p>20 <b>A. There is a guardhouse and there is a security entrance.</b></p> <p>21 <b>I could not say whether there are people there with guns</b></p> <p>22 <b>at the time of the incident.</b></p> <p>23 THE CORONER: Can you just help me, I am so sorry to</p> <p>24 interrupt --</p> <p>25 MR RITCHIE: Not at all, sir.</p> <p style="text-align: center;">Page 175</p>
<p>1 through the fortified front gate there is a secure</p> <p>2 holding area before you have to go through further</p> <p>3 barriers to get into the BdV?</p> <p>4 <b>A. Yes.</b></p> <p>5 MR RITCHIE: Thank you.</p> <p>6 THE CORONER: There was such an arrangement?</p> <p>7 <b>A. Yes, yes.</b></p> <p>8 MR RITCHIE: Is it correct that at the front gate there were</p> <p>9 military with guns?</p> <p>10 <b>A. That's not my recollection.</b></p> <p>11 Q. Are you saying that there were no military with guns at</p> <p>12 the front gate of In Salah during your time?</p> <p>13 <b>A. At the front gates of the BdV there were no military.</b></p> <p>14 Q. Can I come then to REB which is a BP/Sonatrach JV. Did</p> <p>15 you ever go to Rhoude El Baguel?</p> <p>16 <b>A. No.</b></p> <p>17 Q. Can I come then to Hassi Messaoud and the BP compound</p> <p>18 there. Did you ever visit that?</p> <p>19 <b>A. Well, you need to be clear here. There's a JV compound</b></p> <p>20 <b>and there is a BP office in another compound in another</b></p> <p>21 <b>part of Hassi Messaoud. So I'm assuming you mean the JV</b></p> <p>22 <b>compound, just to be clear.</b></p> <p>23 Q. Would you grant me a second. (Pause) I do mean the JV</p> <p>24 between BP and Sonatrach relating to In Salah and</p> <p>25 In Amenas, the BP JV compound?</p> <p style="text-align: center;">Page 174</p>	<p>1 THE CORONER: -- both of you. But the dimensions of this</p> <p>2 location as opposed to In Amenas, so a solid wall round</p> <p>3 part of it. I mean, what kind of distance are we</p> <p>4 talking about?</p> <p>5 <b>A. Again --</b></p> <p>6 THE CORONER: And it can be checked but just to give me some</p> <p>7 kind of idea.</p> <p>8 <b>A. The site of the JV, you're really testing me now. It</b></p> <p>9 <b>would be -- it would probably be something in the order</b></p> <p>10 <b>of 5 to 8 acres of space, the JV compound and that is,</b></p> <p>11 <b>you know, a wild guess, but you should probably validate</b></p> <p>12 <b>that.</b></p> <p>13 THE CORONER: All right, so sorry.</p> <p>14 MR RITCHIE: I will come to the In Amenas site. You say in</p> <p>15 your witness statement at page 8 that you have no</p> <p>16 operational knowledge of In Amenas. What did you mean</p> <p>17 by that?</p> <p>18 <b>A. Well, I have never held a position at the JV, In Amenas</b></p> <p>19 <b>JV, so my operational knowledge is limited.</b></p> <p>20 Q. Thank you. Do you agree with Mr Cobb that the BdV was</p> <p>21 not designed to withstand a terrorist attack?</p> <p>22 <b>A. Sorry, repeat the question?</b></p> <p>23 Q. Do you agree with Mr Cobb that the BdV was not designed</p> <p>24 to withstand a terrorist attack?</p> <p>25 MR POPAT: I don't want to be difficult but I think</p> <p style="text-align: center;">Page 176</p>

<p>1 Mr Cobb's answer was it was not designed to withstand 2 a terrorist attack of the type that occurred. 3 THE CORONER: Yes, I think that's right. 4 MR RITCHIE: Would you grant me a second, sir? 5 THE CORONER: Yes, of course. (Pause). Anyway, I think 6 even if he didn't say that it would have to be a bit 7 more specific than that because there are some kinds of 8 terrorist attack one can immediately imagine that almost 9 nowhere is -- so don't worry about looking it up. 10 I think if you can be a bit more specific. 11 MR RITCHIE: I am certainly going to be more specific and I 12 have looked it up and would have asked a question but 13 I will follow your guidance of course. 14 After I had asked the general question of Mr Cobb 15 I then came down to the question of myself turning up 16 with an AK47 at the guardhouse in a vehicle and he 17 accepted that it wasn't designed to prevent an attack by 18 one man in a vehicle. So I will make it specific if 19 there is a vehicle with at least one terrorist in it and 20 an AK47 this BdV was not designed to withstand that sort 21 of attack, was it? 22 <b>A. It sort of depends you know, on what is happening.</b> 23 <b>I mean, are you saying that the vehicle would try to</b> 24 <b>charge the fence, break through the -- I am sort of</b> 25 <b>struggling with the hypothetical situation.</b></p> <p style="text-align: center;">Page 177</p>	<p>1 checkpoint and the second, took some damage for the 2 driving was apparently not sufficiently good enough to 3 avoid the bollards and ended up at point D on the map. 4 You will see the photographs are all lettered D and 5 there is a red arrow showing where the car ended up at 6 BdV. 7 It is no longer hypothetical, are you comfortable 8 with the question that the BdV was not designed to 9 withstand a terrorist attack at the front gate? 10 <b>A. Of that style, yes.</b> 11 Q. So as a fact there were no armed Gendarmes accommodated 12 at the guard post at BdV, were there? 13 <b>A. That's correct.</b> 14 Q. And there were none in the secondary guardhouse, if it 15 can be graced with that term, the other side of the car 16 park in BdV? 17 <b>A. That's my understanding.</b> 18 Q. And there were none patrolling the perimeter fences in 19 between fence number 1, which has been indicated by 20 Mr Cobb on the outside, and fence number 2 which has 21 been indicated on the inside, no Gendarmes patrolled in 22 between them in 2012 or up to 16 January 2013, did they, 23 Mr Collins? 24 <b>A. I don't know.</b> 25 Q. There was no safe haven built in the BdV at In Amenas,</p> <p style="text-align: center;">Page 179</p>
<p>1 Q. Are you? Shall we go to the reality and look at the 2 exhibit IA026 and in particular page 5. That is quite 3 a large document. IA026, page 5. Thank you for taking 4 it up on the screen. If in a 4 by 4 a terrorist drove 5 around or over the bollards and arrived at the gate of 6 the BdV with a gun the civilian guard would be able to 7 do nothing about preventing him from getting through, 8 would he? 9 <b>A. That's correct.</b> 10 Q. And then the terrorist would drive through to the second 11 guardhouse which is visible on that map on page 5 and 12 has been identified by Mr Cobb. There is a second 13 entrance there which a terrorist could equally, with 14 a gun, go through without a civilian unarmed guard 15 stopping him? 16 <b>A. Well, assuming that the aggressor had not been</b> 17 <b>challenged by Gendarmerie and it was completely</b> 18 <b>unchallenged then they-</b> 19 Q. That is the nature of the question. 20 <b>A. Then they would be able to proceed to the next stage as</b> 21 <b>you describe.</b> 22 Q. If you turn to page 7, and I wonder if this could be 23 brought up on the screen, we see there what we are led 24 to believe as the terrorists' vehicle that drove 25 straight through the chicane, through the first armed</p> <p style="text-align: center;">Page 178</p>	<p>1 was there? 2 <b>A. You need to describe a safe haven.</b> 3 Q. Have you really never come across a safe haven? 4 <b>A. I have heard of safe havens.</b> 5 Q. Tell us what you know of them? 6 <b>A. Safe havens, they are places where people can gather for</b> 7 <b>evacuation and so forth or -- so it can mean different</b> 8 <b>things.</b> 9 Q. What is the other meaning? 10 THE CORONER: I think you are just being asked about, was 11 there some place, we heard about one, I think, but 12 a particularly safe area that could be locked, secured 13 that might delay things long enough if people were in 14 serious danger for help or at least the possibility of 15 help to arrive. I think that's what -- 16 <b>A. Yes, thank you. As far as I know, there was no safe</b> 17 <b>haven inside the BdV.</b> 18 MR RICHIE: So the safety of the expats at BdV depended 19 wholly upon Gendarmes getting to the BdV from their camp 20 or wherever they were before terrorists got to the front 21 gate, didn't it? 22 <b>A. Well, not quite. Because the Gendarme are doing their</b> 23 <b>zonal patrols. So, you know, they are out doing all</b> 24 <b>their zonal patrols. So to say that there's nothing</b> 25 <b>stopping anybody getting to that front gate and</b></p> <p style="text-align: center;">Page 180</p>

<p>1 <b>proceeding as you say is not really true because the --</b></p> <p>2 Q. I did not say there is nothing stopping them. I am</p> <p>3 saying, and the question I will rephrase so that it is</p> <p>4 clear, is that: the Gendarmes need to get to the front</p> <p>5 gate of BdV before the terrorists, don't they?</p> <p>6 <b>A. If the terrorists have been able to get through the</b></p> <p>7 <b>militarised zone and through all the other zones then,</b></p> <p>8 <b>yes.</b></p> <p>9 Q. Thank you. Did you see that as a weakness in the</p> <p>10 security protection for expats at BdV?</p> <p>11 <b>A. The -- no.</b></p> <p>12 Q. Why leave that risk? Why not put armed Gendarmes in the</p> <p>13 guardhouses at BdV?</p> <p>14 <b>A. Because the -- In Amenas was protected. It was inside</b></p> <p>15 <b>a militarised zone which had heavy military patrolling</b></p> <p>16 <b>those areas. The site and the people were protected by</b></p> <p>17 <b>the Gendarmerie, which is a significant number of</b></p> <p>18 <b>Gendarmerie, so the site had those levels of protection</b></p> <p>19 <b>and then further out there were border guards as well.</b></p> <p>20 <b>So you know, there were multiple layers of protection</b></p> <p>21 <b>against terrorists getting through.</b></p> <p>22 Q. Yes, but we have heard about the layers. Do you expect</p> <p>23 perfection from those layers or rather did you at that</p> <p>24 time expect perfection from those layers?</p> <p>25 <b>A. I don't think perfection is needed to make them work.</b></p> <p style="text-align: center;">Page 181</p>	<p>1 <b>So you know, there were reasonable counter arguments</b></p> <p>2 <b>to say this was okay.</b></p> <p>3 Q. What about the express directive that liaison could no</p> <p>4 longer communicate with the military or Gendarmes?</p> <p>5 <b>A. Sonatrach were, I think, trying to bring a more direct</b></p> <p>6 <b>communication between the staff at the site and the</b></p> <p>7 <b>authorities and --</b></p> <p>8 Q. They were cutting out liaison, were they not?</p> <p>9 <b>A. By the way it was stated it may look like that, yes.</b></p> <p>10 Q. It was expressly stated that liaison were not to</p> <p>11 interfere by communicating with the Gendarmes or the</p> <p>12 military. That's the December reminder for what they</p> <p>13 issued in the June of 2012, expressly that the liaison</p> <p>14 that fed to you and to the JV were not allowed to</p> <p>15 communicate with the Gendarmes. Were you comfortable</p> <p>16 with that, Mr Collins?</p> <p>17 <b>A. I didn't see that.</b></p> <p>18 Q. We had better go to the document I think. Forgive me,</p> <p>19 sir, I don't have that to hand.</p> <p>20 THE CORONER: That's all right. If you just tell us you may</p> <p>21 get some help, not from me but what is it we are looking</p> <p>22 for?</p> <p>23 MR RITCHIE: It is core bundle 1 and tab 3. This is an</p> <p>24 Algerian document but there is a translation, so if you</p> <p>25 could use that, Mr Collins. I am on page 13.</p> <p style="text-align: center;">Page 183</p>
<p>1 <b>They don't have to be absolutely perfect. I don't know</b></p> <p>2 <b>the strategy, the precise tactics that the military</b></p> <p>3 <b>would use to sweep the areas so I'm not sure they needed</b></p> <p>4 <b>perfection. But the fact is because you have the</b></p> <p>5 <b>multiple layers, the multiple layers mean that if</b></p> <p>6 <b>something fails you have another layer to protect.</b></p> <p>7 Q. May I turn briefly to liaison. Did you object to the</p> <p>8 transfer of functions from liaison to SSI?</p> <p>9 <b>A. No.</b></p> <p>10 Q. Why?</p> <p>11 <b>A. Because what was happening with the transfer was that</b></p> <p>12 <b>basically Sonatrach was attempting to try to bring some</b></p> <p>13 <b>more standardisation to the way it guarded facilities,</b></p> <p>14 <b>both its own facilities and facilities with foreign</b></p> <p>15 <b>operators, and there were potentially some advantages of</b></p> <p>16 <b>them doing that because they could standardise training,</b></p> <p>17 <b>recruitment standards and so forth. That was, you know,</b></p> <p>18 <b>seen as, you know, relatively something that Sonatrach</b></p> <p>19 <b>was going to do.</b></p> <p>20 <b>Sometimes when you are in these situations where you</b></p> <p>21 <b>have a national company that national company has got to</b></p> <p>22 <b>sometimes take a slightly greater lead on things and</b></p> <p>23 <b>they decided on this case that they would standardise</b></p> <p>24 <b>the guarding force under SSI and have more reporting</b></p> <p>25 <b>lines through to their Algiers office.</b></p> <p style="text-align: center;">Page 182</p>	<p>1 <b>A. Okay, got it.</b></p> <p>2 Q. This is a document referenced to a decision of SIE</p> <p>3 in July 2012 and that document is referred back to by</p> <p>4 this document in this way:</p> <p>5 "The minutes of the District Security Commissions</p> <p>6 report the involvement of expatriate managers in the</p> <p>7 management of internal security which is contrary to the</p> <p>8 current regulations in force."</p> <p>9 I am assuming that that refers back to the decision</p> <p>10 of July 2012. Are you comfortable with that</p> <p>11 interpretation, that the current regulations in force</p> <p>12 are those regulations from July 2012?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. Thank you:</p> <p>15 "In particular, regarding to communications with the</p> <p>16 military authorities. The management of security</p> <p>17 measures in place, including but not limited to those</p> <p>18 relating to the security guards, entry control,</p> <p>19 electronic surveillance. For this reason and as</p> <p>20 required by the local and military authorities, we ask</p> <p>21 that from now on you inform the [JV] partner that</p> <p>22 managing internal security is a role to be carried out</p> <p>23 exclusively by Sonatrach. Clearly define the roles and</p> <p>24 responsibilities of the expatriate personnel charged</p> <p>25 with logistical communication and supporting</p> <p style="text-align: center;">Page 184</p>

46 (Pages 181 to 184)

<p>1 responsibilities. These must under no circumstances 2 interfere with the assignments of the [ISA] either 3 currently in force or as may be determined by Sonatrach. 4 "As a reminder the [ISA] OOC or Field is either 5 under the direct hierarchal authority of the Group 6 Administrator, Director General of the OOC or Field 7 Director (as appropriate) and under the managing 8 authority of the SIE/AST Coordinator. Their principal 9 duties are defined according to the decision cited 10 below." 11 And those duties include seven bullet points down: 12 "To liaise with the authorities and security 13 services." 14 Now, that was a warning to stop communicating with 15 the Gendarmes and the military through expat liaison, 16 wasn't it? 17 <b>A. It appears to be written like that, yes.</b> 18 Q. Did you really not see that? 19 <b>A. I did not see that.</b> 20 Q. And you did not see the regulation from the July before 21 saying the same thing? 22 <b>A. Sorry, the regulation -- I didn't see this letter before 23 the attack. The regulations, forgive me ...</b> 24 Q. This letter referred to a July decision upon which it is 25 based and it was complaining about a breach of that July Page 185</p>	<p>1 Q. So what Mr Cobb told us in his evidence was your 2 understanding he fought for liaison to maintain 3 a communication link with the Gendarmes and the military 4 and he achieved it on a local basis at In Amenas? 5 <b>A. Well, as I said, there was also the Hassi Messaoud, 6 where also the liaison manager was based, and he also 7 I believe continued to have a relationship with the 8 military and --</b> 9 Q. At two levels, In Amenas and Hassi? 10 <b>A. At two levels.</b> 11 Q. Okay, good. I will move on to another topic. 12 Investigation after the attack. 13 You have been since September 2011 the most senior 14 BP employee involved in the JV as I understand it? 15 <b>A. Yes, but I'm not in the JV. Sorry --</b> 16 Q. Sitting on the CdG? 17 <b>A. Right, yes, yes.</b> 18 Q. After the attack did BP carry out an investigation of 19 the security inadequacies at the plant? 20 <b>A. No, BP didn't carry out an investigation following the 21 attack at In Amenas.</b> 22 Q. BP did not carry out any investigation of the security 23 inadequacies at the plant? 24 <b>A. So what BP did, I mean, obviously this was, you know, 25 a major act of terror in a foreign jurisdiction</b> Page 187</p>
<p>1 decision. 2 <b>A. I didn't see the July documentation.</b> 3 Q. It all fits in, as I understand it, Mr Collins, because 4 we are told that it is about June that they started to 5 transfer, June or July so it seems to fit in with the 6 transfer to SSI. But looking at that now and 7 understanding the clash what you have on the one hand is 8 SSI saying "stop interfering, liaison, we communicate 9 with the military" and on the other hand Mr Cobb 10 struggling with his liaison to do the job that they are 11 set, and expressly set the job, of communicating with 12 the military? 13 <b>A. My understanding of the situation was that the -- whilst 14 the SSI transition had taken place that they came to 15 a working arrangement at In Amenas where the liaison 16 were able to maintain a dialogue with the authorities. 17 They did that in combination with the ASI, the head of 18 the SSI group. They also did it, you know, at 19 Hassi Messaoud as well. So in Hassi Messaoud the 20 liaison manager, I believe, still managed to hold 21 a relationship with the military and indeed, met the 22 military.</b> 23 <b>So it says this but at the working level the liaison 24 group who had long established good relationships with 25 the authorities were able to continue them.</b> Page 186</p>	<p>1 <b>involving multiple nationalities and it was very clear 2 and right that the authorities should step in and 3 investigate this matter. They would have a much more 4 comprehensive ability to reach people, to be able to 5 access information which an internal investigation 6 inside BP would never be able to have that reach.</b> 7 <b>So our position has been to participate as fully as 8 possible with all of the official investigations. This 9 of course is one of them. And be able to extract 10 lessons from those investigations as they continue and 11 complete.</b> 12 Q. Thank you. I did not ask about criminal investigations. 13 Clearly that is a matter for the Algerian authorities. 14 I asked about the security inadequacies at the JV plant. 15 Have you carried out no investigation and had no report 16 from anyone on the security inadequacies at the plant? 17 <b>A. So at In Amenas the partners have visited the site. We 18 have a recollection of what actually happened at the 19 site from discussion, from talking to people that 20 obviously were at the site and from that the security 21 advisers have advised various measures in discussion 22 with the military and the Gendarmerie at In Amenas.</b> 23 Q. And have any documents arising from that been given to 24 Her Majesty's Coroner? 25 <b>A. I don't know.</b> Page 188</p>

47 (Pages 185 to 188)

1 Q. Can I come then quickly to the drivers. Two drivers,  
 2 one named O and the other named C, were stationed at  
 3 Rig T212 on the night of 15 January to the morning of  
 4 16 January and Tom Martin has given a witness statement  
 5 and will give evidence to Her Majesty's Coroner that  
 6 they were reported missing overnight that night with  
 7 their allocated vehicles, 92 and 85. Did you become  
 8 aware of this fact after the attack?  
 9 **A. No.**  
 10 Q. Have you been aware of it at all before today?  
 11 **A. I've been aware of a discussion around it. Not someone**  
 12 **telling me it was a fact.**  
 13 Q. Have you not had any information from Tom Martin about  
 14 it?  
 15 **A. No.**  
 16 Q. Let's just work on the assumption that he will come and  
 17 give evidence to that effect. Would you wish to know  
 18 what happened?  
 19 **A. Yes.**  
 20 Q. Have you carried out any investigations of those drivers  
 21 to find out why they left without permission, if that is  
 22 what they did?  
 23 **A. BP is not able to interview specific drivers so, no.**  
 24 Q. I thought liaison were in charge of the drivers and that  
 25 decision had been taken at the back end of 2012. We  
 Page 189

1 have heard that evidence from Mr Cobb.  
 2 **A. I can't say yes or no. If that's what liaison have told**  
 3 **you or the coroner, I couldn't dispute it one way or the**  
 4 **other. I don't know.**  
 5 Q. Forgive me a second. Sir, may I just raise the topic in  
 6 this way. The question has been asked and it has been  
 7 put and a letter has kindly been provided by BP through  
 8 their solicitors which says that the Algerian company  
 9 Sonatrach will not allow these drivers to be interviewed  
 10 but they will allow the Algerian police to interview  
 11 them if the Met Police will make a request and so it is,  
 12 if you will, an outstanding matter of concern to the  
 13 family of Carlos Estrada to see whether that could be  
 14 effected within some reasonable timescale. May I just  
 15 put that on the many list of things you have to do?  
 16 THE CORONER: Yes, I have made a note of it and I will come  
 17 back to you on that.  
 18 MR RITCHIE: Thank you.  
 19 Mr Collins. How many drivers or guards were  
 20 arrested after the attack?  
 21 **A. I don't know.**  
 22 Q. Why don't you know?  
 23 **A. Because the -- this attack was under the exclusive**  
 24 **control of the military. They would have handed it over**  
 25 **to the local police and they took control. I have no**  
 Page 190

1 **idea what they did immediately after the attack.**  
 2 Q. I did not ask that, Mr Collins.  
 3 **A. Okay, sorry.**  
 4 Q. If I say what did the military do immediately after the  
 5 attack that would have been a very good answer.  
 6 THE CORONER: Sorry, just ask the question again, that's all  
 7 right. There is no need to --  
 8 MR RITCHIE: Forgive me. What I asked was how many drivers  
 9 or guards were arrested by the Gendarmes after the  
 10 attack? May I assist you with that question by saying  
 11 I have seen your very long and detailed staff lists, for  
 12 guards, drivers and everyone who is on site day by day.  
 13 **A. I don't know is the answer to your question.**  
 14 Q. Could you find out by looking at the list of people who  
 15 are on site before and return after?  
 16 **A. I don't know whether it would be that simple to say --**  
 17 THE CORONER: It suppose it depends whether it says -- it  
 18 may say someone's here one day and not the other.  
 19 **A. Yes.**  
 20 THE CORONER: It may depend on whether it says why they  
 21 weren't there.  
 22 **A. I wouldn't know that. That is a level of detail that is**  
 23 **inside the JV. First of all, I'm not sure how you'd you**  
 24 **would be able to determine the reason for the after**  
 25 **difference, if you like, between the before and after,**  
 Page 191

1 **that would be a practical issue. But I just don't have**  
 2 **that type of information. I don't operate at that level**  
 3 **in this chain of this business.**  
 4 THE CORONER: What you are really saying is has anybody got  
 5 a piece of paper which says so-and-so didn't turn up for  
 6 work because they had been arrested. We have got that.  
 7 MR RITCHIE: I will move on.  
 8 Do you have information available to you that could  
 9 help this court with how many drivers or guards failed  
 10 to return to work at all after the attack?  
 11 **A. I don't have that information.**  
 12 Q. No, I didn't say you have it. Do you have it available  
 13 to you?  
 14 **A. It's not available to me.**  
 15 Q. It would be within the JV though, wouldn't it?  
 16 **A. Possibly it's inside the JV, yes.**  
 17 Q. For you must know who your staff is and who you are  
 18 paying?  
 19 **A. So the JV would be able to determine that.**  
 20 Q. Yes. Thank you. Can I turn briefly to the civil crisis  
 21 plan and I am aware we have gone over these documents  
 22 a number of times so I will do it quickly.  
 23 You say in your witness statement at page 15 that  
 24 you instigated a review of this document when you were  
 25 at In Salah?  
 Page 192

<p>1 <b>A. Yes.</b>                  2 Q. We have seen it before. It is at tab 13 of the first                  3 core bundle. It has various alert levels set out within                  4 it, doesn't it?                  5 <b>A. Yes.</b>                  6 Q. At the low and medium levels all persons are expected                  7 still to be present on site, aren't they?                  8 <b>A. I would need to refresh my memory but I'll take your</b>                  9 <b>word for it.</b>                  10 Q. No, I will take you to it. I didn't mean to catch you                  11 out or anything. Let's go to core bundle 1, tab 13.                  12 <b>A. Okay, I'm there. Sorry, which page?</b>                  13 Q. It starts at 142.                  14 <b>A. Yes.</b>                  15 Q. Are you familiar with this document?                  16 <b>A. I can remember this document, yes.</b>                  17 Q. Thank you. Do you therefore remember that at the low                  18 level all staff remain at plant?                  19 <b>A. Yes.</b>                  20 Q. And at the medium level likewise all personnel remain at                  21 plant. If it helps you that is on page 145.                  22 <b>A. Not a very good copy of it.</b>                  23 Q. Yes, mine is a bit ropy too. But alert level medium,                  24 project activity, all normal project activity, personnel                  25 all present?</p> <p style="text-align: center;">Page 193</p>	<p>1 <b>necessarily a shut down of production.</b>                  2 Q. So that I understand your evidence because forgive me,                  3 I don't fully understand your answer. Are you saying                  4 that the plant will continue to produce the same amount                  5 of product as usual under a high alert?                  6 <b>A. No, I'm not saying that. What I'm saying is that there</b>                  7 <b>is a bit of detail in here in terms of, just because</b>                  8 <b>certain people leave doesn't automatically mean</b>                  9 <b>a production facility would shut down. Clearly the</b>                  10 <b>production facility must be maintained by a competent</b>                  11 <b>set of people. However, there are people at</b>                  12 <b>a production facility that are not necessarily directly</b>                  13 <b>related to production activities. So I am just saying</b>                  14 <b>there's a bit of devil in the detail of this, which</b>                  15 <b>I think this is -- as it says at the top this is an</b>                  16 <b>overriding principle of the plan and then I think the</b>                  17 <b>detail comes later on. I think that's what I'm</b>                  18 <b>struggling with in terms of this.</b>                  19 Q. I hope the question isn't too obscure. I assume when                  20 the first wave are being removed they are likely to be                  21 expats, are they?                  22 <b>A. Probably.</b>                  23 Q. Would that affect production?                  24 <b>A. It would depend on whether the managers --</b>                  25 THE CORONER: It would depend on what they were doing,</p> <p style="text-align: center;">Page 195</p>
<p>1 <b>A. Yes.</b>                  2 Q. So it is only when we get to the high level that there                  3 is relocation starting, staff are being pulled from                  4 site?                  5 <b>A. Yes.</b>                  6 Q. Moving from medium to high is economically quite                  7 a damaging decision, isn't it?                  8 <b>A. No.</b>                  9 Q. If you start the first wave of relocation does that                  10 affect the business?                  11 <b>A. It would affect some aspects of the business, but in the</b>                  12 <b>short term that wouldn't -- it depends on what you mean</b>                  13 <b>by some harm economically. That wouldn't mean</b>                  14 <b>potentially closing down the plants. It depends on, you</b>                  15 <b>know, what the roles were.</b>                  16 Q. If you see at page 145 after the first wave of                  17 relocation:                  18 "Ongoing relocation of nonessential staff as safe                  19 shut down of activities is accomplished."                  20 Does that affect the product that's being produced?                  21 <b>A. Well, I think it would be -- it's a yes but, because</b>                  22 <b>some of those activities might be activities that are</b>                  23 <b>not affecting today's production. So it may be</b>                  24 <b>affecting something else later on. So you know, it says</b>                  25 <b>there a shut down of activities. It doesn't say</b></p> <p style="text-align: center;">Page 194</p>	<p>1 wouldn't it?                  2 <b>A. Yes, the managers would basically have to look at all</b>                  3 <b>the shift patterns. They would have to then, you know,</b>                  4 <b>shuffle the shift patterns to make sure that certain</b>                  5 <b>positions were covered. So I would say that if you were</b>                  6 <b>taking the expats out straight -- in an unscheduled way,</b>                  7 <b>then it depends. Do you see how it is a bit more</b>                  8 <b>complicated than just take an expat out, shut down</b>                  9 <b>a production train. It is not quite as straight line as</b>                  10 <b>that.</b>                  11 MR RITCHIE: I understand. Let us move on then to briefly                  12 deal with the alert level indicators which you will have                  13 had some involvement in. May I ask you this: is it                  14 correct that you are not involved in setting the alert                  15 levels at any of the plants?                  16 <b>A. I am not. That's correct.</b>                  17 Q. But you might have involvement with Barry Shaw at                  18 setting the country alert level?                  19 <b>A. Yes.</b>                  20 Q. Mainly him, in discussion with you?                  21 <b>A. It's -- no, there's discussion with a group of us, so</b>                  22 <b>the bi-annual security review would be the forum where</b>                  23 <b>I would seek other opinion from other people to balance</b>                  24 <b>our own opinion. And we would make a conclusion at what</b>                  25 <b>level to set the alert level for the country.</b></p> <p style="text-align: center;">Page 196</p>

<p>1 Q. I am not going to take you through the alert levels  2 medium and the indicators and the actions, and for high  3 and the indicators and the actions. We have been  4 through those with Mr Cobb. They are before the court  5 and my learned friend Mr Popat has also been through  6 those and so I am assuming you have got a general  7 understanding of those indicators and actions and I am  8 going to go straight to the Algeria forum that you have  9 mentioned.  10 <b>A. Yes.</b>  11 Q. You exhibit the document for the regional forum to your  12 witness statement. Can I take you to that?  13 <b>A. Yes.</b>  14 Q. Because in the core bundle there is only one page from  15 it and it would be more informative if we used all of  16 it. That is exhibited to your witness statement at --  17 I think it is page 30 of your attachments. Sir, I hope  18 that Mr Collins' witness statement bundle is available  19 to you?  20 THE CORONER: Don't worry, I will listen carefully. I have  21 it somewhere.  22 MR RITCHIE: Mr Collins, do you have the four pages relating  23 to the Algeria political economic forum before you.  24 <b>A. Yes.</b>  25 Q. Sir, if the core bundle is before you you will at least  Page 197</p>	<p>1 state --"  2 The next point:  3 "In the event of military intervention in Northern  4 Mali we should expect a return of AQIM fighters back  5 into Algeria. AQIM are still capable of like  6 spectaculars like VBIEDs."  7 Vehicle borne improvised explosive devices?  8 <b>A. Yes.</b>  9 Q. Car bombs and the like?  10 <b>A. Car bombs.</b>  11 Q. And suicide attacks?  12 <b>A. Yes.</b>  13 Q. So was that the sort of headline, if you will, that was  14 being communicated to your security review group?  15 <b>A. Those were the headline bullet points. Obviously there  16 was then discussion around that and you can see that on  17 the -- there's more discussion points on the page  18 overleaf, but, yes.</b>  19 Q. I am coming to those.  20 <b>A. Sure.</b>  21 Q. So the analysis and recommendation, the second bullet  22 point:  23 "Civil unrest will continue to be a major issue."  24 There has been a suggestion that there wasn't any  25 civil unrest. To make it clear this BP forum on  Page 199</p>
<p>1 get one page of this from core bundle part 3, tab 1. So  2 this took place in November 2012 according to the date  3 on the first page, didn't it, Mr Collins?  4 <b>A. Yes.</b>  5 Q. And on the second page of this, the slide, if that is  6 what it is, is this a PowerPoint slide or is this  7 a written document produced from the forum?  8 <b>A. A PowerPoint slide.</b>  9 Q. So it is Algeria remains level 2 for travel and medium  10 security alert?  11 <b>A. Yes.</b>  12 Q. Is this the information related the forum or the product  13 from the forum?  14 <b>A. This was submitted to the forum and then we discussed it  15 and at the end of the meeting debated whether anything  16 should change.</b>  17 Q. It recites, so the information given to you:  18 "Overall there is a decline in terrorist activity  19 with the military scoring constant hits against AQI.  20 There remains well organised terrorist groups firmly  21 implanted into the Kabylie mountains."  22 Are those the mountains in the north?  23 <b>A. Yes.</b>  24 Q. "Three Algerians now lead AQIM and its allies, Ansar  25 Dine and MUJAO and set up effectively an Islamist  Page 198</p>	<p>1 security, it was -- there was evidence that civil unrest  2 continued to be a major issue, subject of course to the  3 government continuing to buy their way out they should  4 be able to keep a lid on the major discontent. Was that  5 discussed as well?  6 <b>A. Yes, it was.</b>  7 Q. And continuation of the current state of alert and  8 review security plans and procedures regularly to ensure  9 fit for purpose. So that was the advice. Were you  10 comfortable with that advice and recommendation?  11 <b>A. Well, those were the items that were listed to initiate  12 a discussion around those and then it would be expanded,  13 so each of those points would be used as a way of  14 opening a conversation around a group of people.</b>  15 Q. Thank you.  16 <b>A. Yes.</b>  17 Q. Could I come then to over the page, I think this is the  18 page which is available in your core bundle, sir.  19 Security measures:  20 "Police chief Abdelghani Hamel made a statement  21 in June that the terrorist threat remains in all of  22 Algeria."  23 That was clearly just a factual matter put before  24 you:  25 "The military were reinforcing southern oil sector  Page 200</p>

<p>1 areas after the Tamanrassat suicide bombing with 7,000 2 extra soldiers."</p> <p>3 Can I just deal with the Tamanrassat suicide 4 bombing. You say you had confidence in the Gendarmes 5 and the military to prevent terrorists getting to your 6 front door. They weren't capable of preventing 7 terrorists getting to their own front doors, were they?</p> <p>8 <b>A. I mean, I don't know the situation in Tamanrassat in 9 terms of the detail. Tamanrassat is a city. It is 10 a suburb, an environment, it is a different environment 11 to In Amenas. So the route that the suicide bomber took 12 to be able to get to its intended destination, I just 13 don't know the detail of that.</b></p> <p>14 Q. I didn't ask you to know the detail. But they weren't 15 able to prevent suicide bombers getting to their own 16 front doors, were they?</p> <p>17 <b>A. That seems to be correct, yes.</b></p> <p>18 Q. And yet you relied on them as being able to prevent 19 suicide bombers getting to your unguarded front door?</p> <p>20 <b>A. No. Because the -- as has been mentioned before, we -- 21 In Amenas is inside a militarised zone so anyone wishing 22 to get to do any harm in In Amenas has to get across the 23 militarised zone. If they happen to want to come from 24 another country they have to get across border controls. 25 Then they have to get into the zones that the Gendarme</b></p> <p style="text-align: center;">Page 201</p>	<p>1 elsewhere?</p> <p>2 <b>A. That is correct. There were -- the Gendarmerie were 3 being attacked in numerous places.</b></p> <p>4 Q. And the summary at the bottom: 5 "Constant small scale terrorist attacks with IEDs, 6 ambushes and assassinations almost every week." 7 That was what was reported to you?</p> <p>8 <b>A. That's what it says.</b></p> <p>9 Q. And AQIM now effectively have almost complete control 10 over Northern Mali via a collaboration between and MNLA, 11 Ansar Dine and MUJAO. 12 What confuses the family, what they don't understand 13 when you give the evidence that you give that everything 14 was fine, just keep things the way they are, is why you 15 didn't put guards on the front gate of BdV?</p> <p>16 <b>A. So in the context of this meeting if you go back to the 17 previous page we looked at the casualty figures that 18 were occurring throughout the whole country and Algeria 19 is a country which has -- is actually on the probably, 20 you know, 12 years out of civil conflict. It still has 21 a high military presence in order to sort of maintain 22 its stability. There are terrorist activity going on in 23 the country and the military is intervening as there are 24 examples that are in all the submissions. 25 So there is lots of activity going on but there are</b></p> <p style="text-align: center;">Page 203</p>
<p>1 are guarding, so that's not quite the case.</p> <p>2 Q. In Ourgla in June, MUJAO, based in Mali, managed to 3 suicide bomb the Gendarme barracks. They needed to get 4 across the border. They needed to get to Ourgla. They 5 needed to get to the Gendarme barracks and then they 6 suicide bombed it. Similar factors apply and yet you 7 were relying on the military and the Gendarmes to 8 prevent terrorists getting to your front door. This is 9 clear evidence, isn't it, that they couldn't prevent 10 attacks on themselves?</p> <p>11 <b>A. I don't know where the terrorists came from for Ourgla, 12 whether they came across the border, whether they came 13 across the desert. I don't know. But clearly they did 14 get to the Gendarmerie in Ourgla and detonated a bomb.</b></p> <p>15 Q. Then on 17 June, the next incident, large scale 16 terrorist attack on Daira office and police station near 17 Tizi Ouzzou. That is up in the north. Attack conducted 18 by 50 heavily armed men in two groups and the north is 19 the area where much in the past of the terrorist 20 activity took place and there was considerable military 21 resistance and protection.</p> <p>22 So just putting it in a nutshell you had before you 23 in November a range of serious incidents resulting in 24 injury and death where the Gendarmes and the military 25 were taking hits, even though they were successful</p> <p style="text-align: center;">Page 202</p>	<p>1 also lots of examples where the military is making 2 interventions.</p> <p>3 Q. There was still sufficient risk for you to need to 4 protect the expats at BdV though, wasn't there?</p> <p>5 <b>A. And the way the expats were protected at the In Amenas 6 BdV is the layers of protection, there is a militarised 7 zone, heavily militarised. There is 160 Gendarmes at 8 the site for the BdV and the CPF and the rigs and you 9 know all that. So that is how they are protected.</b></p> <p>10 THE CORONER: Would there have been a downside to having 11 armed guards at the entrance to the BdV? Do you see 12 what I mean? I understand your reason that you have 13 given and I have heard what you said about that, but 14 would there have been a disadvantage to having that? 15 Can you have too much? Would it have affected the 16 operation of things in some way that was deleterious or 17 what would have been the minus of doing that? Or 18 perhaps there wasn't one.</p> <p>19 <b>A. Well, the Gendarme were at In Amenas, my understanding 20 of the Gendarme is they were compelled to protect the 21 site and they decided how best to protect the site. 22 That's what their roles were. Their role in life was to 23 do that. And the JV had liaison functions well to sort 24 of assist with making that connection with the Gendarme 25 and bringing concerns to the Gendarme and vice versa.</b></p> <p style="text-align: center;">Page 204</p>

<p>1 <b>And that was all inside a militarised zone. And there</b>  2 <b>was never a tactical request by the Gendarmes to go to</b>  3 <b>do that, to create that advantage is my understanding</b>  4 <b>and I'm not a security expert so, you know, that's as</b>  5 <b>far as I could take it.</b></p> <p>6 MR RITCHIE: One final point. There was no VIP visit risk  7 assessment. You set that out in your witness statement.  8 The reference is page 23. We have been told by Mr Cobb  9 that of course all expats' lives are valued equally.  10 This question is not based upon that. It is this: when  11 you have VIP hostages, VIP hostages, they are more  12 valuable in ransom terms to terrorists, aren't they?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. Risk assessment needs, therefore, to take into account  15 the attractiveness in financial terms of VIPs to  16 terrorists, doesn't it?</p> <p>17 <b>A. Yes, but I didn't see this as a VIP visit. So I know</b>  18 <b>what you're referring to and I would restate that the JV</b>  19 <b>looked at the site to make sure it was safe and secure</b>  20 <b>for everybody, not a VIP or a non-VIP. The particular</b>  21 <b>reference in my statement is referring to a project</b>  22 <b>meeting that had been decided to take place at site.</b>  23 <b>I know exactly what that project meeting was.</b>  24 <b>It was not considered to be a VIP meeting. It just</b>  25 <b>so happened, as I think has been explained, that the</b></p> <p style="text-align: center;">Page 205</p>	<p>1 THE CORONER: So what we will do is we will take ten minutes  2 now. Are you all right to carry on?</p> <p>3 <b>A. Yes.</b></p> <p>4 THE CORONER: All right. Thank you very much.  5 (4.10 pm)  6 (A short break)  7 (4.20 pm)  8 Questions from MR OWEN-THOMAS  9 MR OWEN-THOMAS: Mr Collins, my name is Owen-Thomas, I ask  10 questions on behalf of David Green, the father of  11 Stephen Green.  12 I just want to start with one discrete issue. You  13 were asked by Mr Ritchie about an investigation carried  14 out by BP and as I understand it, your answer is there  15 was none. That is right?</p> <p>16 <b>A. That's correct, yes.</b></p> <p>17 Q. On 18 January last year Mr Green, Mr David Green spoke  18 with Bob Dudley and was told on the telephone BP asked  19 to carry out an investigation and that Mr Green in due  20 course would see it. Were you aware that Mr Dudley had  21 made such a promise?</p> <p>22 <b>A. No.</b></p> <p>23 Q. Have you ever heard of Mr Dudley discussing an internal  24 BP investigation?</p> <p>25 <b>A. No.</b></p> <p style="text-align: center;">Page 207</p>
<p>1 <b>attendees for the meeting, they used a part of the</b>  2 <b>accommodation inside the BdV which was labelled "VIP".</b>  3 <b>It had a label on it saying "VIP". It was accommodation</b>  4 <b>typically used by visitors and not by the regular</b>  5 <b>rotators.</b></p> <p>6 Q. That meeting actually could have been held anywhere in  7 the world, couldn't it?</p> <p>8 <b>A. Well, they had -- yes.</b></p> <p>9 MR RICHIE: Thank you. No further questions.</p> <p>10 THE CORONER: Mr Collins, we have been going two hours and  11 I am very grateful to you for your time and I appreciate  12 that it is a strenuous business so we are going to have  13 a break. What I am just going to try and do is get some  14 kind of estimate from those who have questions. I might  15 need a large pinch of salt.</p> <p>16 MR OWEN-THOMAS: It falls to me next.</p> <p>17 THE CORONER: I am not in any sense being critical but how  18 long do you think you would be?</p> <p>19 MR OWEN-THOMAS: I would estimate 20 to 25 minutes.</p> <p>20 THE CORONER: Anyone else?</p> <p>21 MS GERRY: I think I will be, sir, I suspect similar.  22 Hopefully no more than half an hour but between  23 20 minutes and half an hour. Maybe quicker depending on  24 how familiar Mr Collins is with some of the legislation.</p> <p>25 MS GOLLOP: The same as Ms Gerry, I think.</p> <p style="text-align: center;">Page 206</p>	<p>1 THE CORONER: Sorry, can I just be clear, and I think what  2 you said is you said this, that he was told on the  3 telephone that BP asked to carry out an investigation,  4 I am not quite sure.</p> <p>5 MR OWEN-THOMAS: Are.</p> <p>6 THE CORONER: I heard "asked" and so did the person doing  7 it.</p> <p>8 MR OWEN-THOMAS: Are to carry out.</p> <p>9 <b>A. I was not aware of that conversation.</b></p> <p>10 <b>MR OWEN-THOMAS: I appreciate you may not have been aware of</b>  11 <b>the conversation but you also were not aware that such</b>  12 <b>a promise or commitment had been made?</b></p> <p>13 <b>A. That's correct, I was not aware.</b></p> <p>14 Q. Just to be absolutely sure. You have seen no document  15 at all created by BP which discusses the security  16 inadequacies on 16 January 2013 at In Amenas?</p> <p>17 <b>A. That's correct, yes.</b></p> <p>18 Q. In answer to questions earlier you discussed Mark Cobb's  19 situation as someone who was a BP employee, someone who  20 reported to you, but also was part of the JV.  21 Stephen Green was in a similar position. He was of  22 course a BP employee, wasn't he?</p> <p>23 <b>A. Yes, Stephen was a secondee is my understanding, yes.</b></p> <p>24 Q. He was an employee of BP?</p> <p>25 <b>A. Yes, absolutely, yes.</b></p> <p style="text-align: center;">Page 208</p>

<p>1 Q. And he didn't cease to be an employee when he was 2 seconded to the JV? 3 <b>A. That's correct.</b> 4 Q. You, BP, considered his safety in the workplace along 5 with every other employee of BP? 6 <b>A. Yes.</b> 7 Q. And so when the decision came to ask Stephen to move to 8 Algeria, to work in Algeria or accept his request to 9 work in Algeria, however it came about, you needed to 10 consider whether or not you could do that and keep him 11 safe? 12 <b>A. Yes.</b> 13 Q. You have been asked a lot of questions about the 14 security of the BdV and its ability to withstand some 15 sort of terrorist attack. I am not going to go over 16 that. But you have answered that by placing reliance on 17 two things in particular. A military zone and 18 a Gendarme zone, I put it like that. Is that a fair 19 summary of how you believed the BdV would be protected 20 from a terrorist attack? 21 <b>A. Yes, plus the border security, the militarised zone, the</b> 22 <b>Gendarmes and the internal security at the facilities,</b> 23 <b>BdV and CPF, yes.</b> 24 Q. So the border control, the military zone, the Gendarmes, 25 the internal security I think you accepted didn't Page 209</p>	<p>1 military as being suitable to provide that first ring of 2 protection? 3 <b>A. Yes, so I --</b> 4 Q. Let me ask the question first then. So first of all, 5 how large was the militarised zone that the military 6 were protecting? 7 <b>A. Because I'm not the security expert I couldn't tell you</b> 8 <b>exactly how big the militarised zone is so I don't know</b> 9 <b>the answer to that question.</b> 10 Q. How many soldiers were active within the military zone? 11 <b>A. I don't know.</b> 12 Q. There could have been one or there could have been 13 10,000 or more. You don't know? 14 <b>A. I don't know precisely but --</b> 15 Q. Give me your best estimate. 16 <b>A. It is in the thousands. It would be --</b> 17 Q. More than one thousand, fewer than 10,000? 18 <b>A. It's in the thousands. You know, so I don't know --</b> 19 <b>I have a security manager and they're connected to all</b> 20 <b>of the security people inside the JVs and with all their</b> 21 <b>other peer companies. These are the people that</b> 22 <b>actually know the detail or are better placed to be able</b> 23 <b>to estimate the numbers. I don't know the exact</b> 24 <b>numbers. It's just not part of my direct role. I am</b> 25 <b>supported by some very strong functional people inside</b> Page 211</p>
<p>1 provide any direct guard against a terrorist attack at 2 the BdV? 3 <b>A. Well, I mean, I think in the -- there are the physical</b> 4 <b>layers as well at the sites, the double fencing and all</b> 5 <b>those physical security measures and, you know, they do</b> 6 <b>provide a layer as well.</b> 7 Q. But it is right, isn't it, they are not going to stop 8 a determined fundamentalist terrorist armed with 9 a machinegun getting into the BdV? 10 <b>A. If they have managed to get through the other layers of</b> 11 <b>protection, yes.</b> 12 Q. The Algerian military, I will start by asking you some 13 questions about that. That provided the first of the 14 layer of protection, the militarised zone and the work 15 that the military did within that zone? 16 <b>A. Yes.</b> 17 Q. That was entirely outside of the control of BP. You 18 couldn't direct what the military did or how they did 19 it? 20 <b>A. Yes.</b> 21 Q. So you had to assure yourselves that it was competent, 22 capable and was doing its job to provide that first 23 layer of protection to the BdV. Is that right? 24 <b>A. Yes.</b> 25 Q. So what I want to understand is how you assessed the Page 210</p>	<p>1 <b>in BP, I'm not sure about the others, but in BP I have</b> 2 <b>got that. Those people are connected to security people</b> 3 <b>inside the embassies, in Algiers, and they have that</b> 4 <b>sort of knowledge. I can't, I am afraid I can't give</b> 5 <b>you a number other than it is a number which is</b> 6 <b>a sizeable force that patrols the borders and patrols</b> 7 <b>the military zones. I'm sorry, I can't give you</b> 8 <b>a number other than it is a large force.</b> 9 Q. So you cannot say that the military zone was well 10 protected and capable of preventing terrorists moving 11 within it, from your own knowledge? 12 <b>A. From my own specific knowledge I get that knowledge from</b> 13 <b>talking to the security people, through our risk</b> 14 <b>assessment process, through our bi-annual reviews and</b> 15 <b>they tell me from their sources, which they validate,</b> 16 <b>what the size and scale and they say this is</b> 17 <b>a reasonable amount. I don't carry that number around</b> 18 <b>and I can't tell you what that number is.</b> 19 Q. Let me ask you about the conversations then with the 20 security function. Who was it who told you that in 21 their opinion the military zone was well resourced, 22 competent and able to prevent terrorists moving freely 23 within it? 24 <b>A. That would have been people in the security function</b> 25 <b>inside BP. It would have been people that -- so the</b> Page 212</p>

<p>1 <b>information would have not necessarily come to me</b>                  2 <b>direct. It would have come to me through my security</b>                  3 <b>manager. He would have talked to liaison --</b>                  4 Q. Can ask you this then? Sorry to interrupt but if it                  5 didn't come to you I can perhaps shortcut it by saying:                  6 did anyone tell you, directly to you, Mr Collins,                  7 "I feel that the militarised zone is well resourced, the                  8 soldiers are competent and they can prevent terrorists                  9 moving within it"?                  10 <b>A. Yes, that was discussed.</b>                  11 Q. Who?                  12 <b>A. That would have probably been my security manager.</b>                  13 Q. That is Mr Shaw?                  14 <b>A. Yes.</b>                  15 Q. Did he give you any details? "It is safe and secure                  16 because ..." and then tell you why he thought that?                  17 <b>A. He would explain to me that, you know, from his</b>                  18 <b>intelligence and his connections in the industry his</b>                  19 <b>discussions with embassies, with his fellow security</b>                  20 <b>managers working for other companies, using all of his</b>                  21 <b>sources, supported by the security function inside BP,</b>                  22 <b>through all of those various channels he gets a picture</b>                  23 <b>of what is available. Of course, he will talk to the</b>                  24 <b>liaison who have on the ground understanding. This</b>                  25 <b>particular person also met with a colonel, a senior</b>                  Page 213</p>	<p>1 Q. Did you ever see any of the product of those                  2 conversations?                  3 <b>A. Written product, no.</b>                  4 Q. Did Mr Shaw do you know?                  5 <b>A. I don't know.</b>                  6 Q. So there may contained within BP not a single written                  7 document that gives any reassurance as to the strength                  8 and capability of the Algerian military in the                  9 militarised zone, that wasn't created by BP itself?                  10 <b>A. Sorry, can you say the question again?</b>                  11 Q. Yes. It may well be and it seems to me you have not                  12 seen any documents original source documents from the                  13 Algerians, from the military, from the chain of command,                  14 from the Ministry of Defence in Algeria which backs up                  15 the claims which were made orally to Mr Shaw and others?                  16 <b>A. That's correct.</b>                  17 Q. Do you think they were not willing to commit to writing                  18 what it was their commitment was within the militarised                  19 zone?                  20 <b>A. Algeria is, you know, it is a country that has endured</b>                  21 <b>a lot of conflict in the past. It has strict military</b>                  22 <b>regions that are very important to its stability and</b>                  23 <b>they have conflict in the region. As a result they have</b>                  24 <b>a high reluctance to share information, such as their</b>                  25 <b>capability and so on and so forth. So I could see why</b>                  Page 215</p>
<p>1 <b>colonel in the middle of 2012 to discuss the status in</b>                  2 <b>that particular area. That particular colonel talked to</b>                  3 <b>him, I think actually the JV liaison were there as well</b>                  4 <b>and you know, they talked about what they had, what they</b>                  5 <b>were doing, what the threat picture was. That's how</b>                  6 <b>that information is gathered and comes through.</b>                  7 Q. That's I suspect the first stage of things. What the                  8 military tell you. And perhaps unsurprisingly they say                  9 "we're a competent, capable force". The next stage then                  10 is how you check that, how you make sure, well I am                  11 going to put a number of employees in harm's way,                  12 relying on someone else to protect them. I want to make                  13 sure that what they say is true.                  14 <b>A. Mmm.</b>                  15 Q. So how did you either yourself or have others validate                  16 that what the colonel said was true?                  17 <b>A. So there is a strong relationship between our security</b>                  18 <b>professionals and the defence attaches in the embassies</b>                  19 <b>and the regional security officers. They then validate</b>                  20 <b>that information with those contacts because they have</b>                  21 <b>got a better access to the knowledge of the military</b>                  22 <b>than a private company would have, so they go to the</b>                  23 <b>embassies, they talk to defence attaches, defence</b>                  24 <b>attaches have got relationships with the Algerian</b>                  25 <b>military.</b>                  Page 214</p>	<p>1 <b>it would be difficult for a general to pass on</b>                  2 <b>information say to the UK embassy which could then be</b>                  3 <b>passed on to industry, so I can see the context of why</b>                  4 <b>that situation occurs.</b>                  5 Q. For those reasons there is an obvious difficulty in                  6 validating the truth of what you are being told in                  7 respect of the Algerian military?                  8 <b>A. So we talk to the defence attaches to get information</b>                  9 <b>and assurance from them. We talked to the -- and look</b>                  10 <b>at the independent intelligence agencies that we use</b>                  11 <b>who, you know, that's what they do. That's their job.</b>                  12 <b>They look for this stuff. They assess from various --</b>                  13 <b>so you pull together these sets of information. But in</b>                  14 <b>terms of what you are seeking about a letter from the</b>                  15 <b>Ministry of Defence, we don't have that. What we do</b>                  16 <b>have is the laws say that they must -- the authorities</b>                  17 <b>must protect facilities that have expats on them and</b>                  18 <b>that is the law, but I don't have this letter from the</b>                  19 <b>Ministry of Defence.</b>                  20 Q. I understand that. But what I see is a lot of people,                  21 a lot of documents claiming the same thing. We will                  22 come on later to the Gendarmes. I have seen lots of                  23 documents that claim there are 160 Gendarmes on the                  24 base. I have not seen a single document that proves                  25 that, a roll call, something like that. And it is the                  Page 216</p>

1 same with the Algerian military, isn't it? Everyone  
 2 seems to be being told they are strong and capable but  
 3 no one seems to have taken the time to seek to satisfy  
 4 themselves that yes, they are what they say they are and  
 5 therefore we can deploy staff based on their protection.  
 6 **A. No, that's not true. So the -- our security people**  
 7 **are -- maintain a high level of connection with as many**  
 8 **people as they possibly can in order to try to**  
 9 **understand what the situation is and maintain their**  
 10 **understanding of that situation. So you know, that goes**  
 11 **on constantly. The liaison team, it is my understanding**  
 12 **that the liaison team in the JV, also who are security**  
 13 **professionals, constantly are vigilant and trying to**  
 14 **maintain an understanding of what the military presence**  
 15 **is. So it is a constant monitoring overview situation**  
 16 **that's taking place. They don't start and then stop**  
 17 **and ...**  
 18 Q. There must therefore have been an incredibly terse  
 19 conversation with Mr Shaw late January 2013 when you  
 20 realised everything you had been told was not right.  
 21 Was there? Did you say "well, what went wrong Barry?  
 22 You told me that a group of armed terrorists couldn't  
 23 just drive through the desert and turn up at the door of  
 24 the BdV but last week they did." Did you have that  
 25 conversation?

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1 **A. The conversation we had after the attack or during the**  
 2 **attack was to try to deal with what was happening at the**  
 3 **time and trying to recover as best we could and rescue**  
 4 **people. That's where the focus was.**  
 5 Q. Have you ever asked the question, well what was missing  
 6 from our intelligence? Why didn't we know that in fact  
 7 they could drive through the desert through the  
 8 militarised zone and turn up at the door of the BdV?  
 9 **A. That is a question people are asking all the time and**  
 10 **that is a question that we need to allow the**  
 11 **investigation that the authorities are conducting to**  
 12 **find out, well, how did that happen? I don't think one**  
 13 **single person can answer that question.**  
 14 Q. Forgive me, my question is not how they did it. It is  
 15 how -- I have not seen Mr Shaw's intelligence material,  
 16 I don't think, his source material, his conversations  
 17 with the defence attache. I haven't seen it. So  
 18 I don't know whether they are right or wrong or even if  
 19 they exist. But they didn't tell BP the information it  
 20 needed to know in respect, for example, of this attack.  
 21 It was wrong in that sense, wasn't it? And what I am  
 22 asking you about is not how the terrorists drove through  
 23 but whether you have given any consideration as to what  
 24 was missing in your intelligence gathering or that  
 25 exercise such that you didn't know it was possible to

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1 happen and it could happen. Have you had that  
 2 conversation with Mr Shaw? "What was missing in our  
 3 intelligence, what did we miss out, what did we not  
 4 gather that we should have known?"  
 5 **A. Yes, we have had that discussion, yes.**  
 6 Q. What was the outcome?  
 7 **A. Well, the outcome is still we don't really know exactly**  
 8 **whether there was some intelligence. As far as we could**  
 9 **see there was no direct intelligence pointing towards**  
 10 **this type of attack occurring at this particular time at**  
 11 **this particular location. So --**  
 12 Q. My question doesn't relate to the intelligence though in  
 13 relation to the attack. It was the inability of the  
 14 army to stop it. Because of course there will be  
 15 terrorist attacks in the future as there have been in  
 16 the past. Sometimes there will be intelligence about  
 17 them and sometimes there won't. So what you are  
 18 concerned with is protecting yourself, whether you have  
 19 advance notice or not. One of those rings of security  
 20 was the military and it failed on this occasion. And so  
 21 what I was asking you about is why was your  
 22 understanding of the military wrong in that that first  
 23 layer, that it wasn't capable of guarding the zone?  
 24 **A. Yes, we don't know exactly how the military on that**  
 25 **particular occasion did not intercept that group. We**

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1 **don't know.**  
 2 Q. I understand from Statoil's website that the In Amenas  
 3 site returned to normal operation on 1 September this  
 4 year, a fortnight ago or so. Is that your understanding  
 5 as far as BP is concerned?  
 6 **A. Yes, that's my understanding.**  
 7 Q. With expat workers working on the site?  
 8 **A. Yes.**  
 9 Q. Do you now know how many soldiers protect the  
 10 militarised zone?  
 11 **A. Approximately, yes.**  
 12 Q. And how many is it now?  
 13 **A. So obviously you know, I'm not the general manager of**  
 14 **that site so this is a rough estimate, I believe the**  
 15 **Gendarme is about the same number. In addition to the**  
 16 **Gendarme the Algerian authorities and the Algerian**  
 17 **military have decided to locate a regiment of military**  
 18 **at the In Amenas facility.**  
 19 Q. That is quite different, so I don't think I need to ask  
 20 you about that then.  
 21 Can I ask you though, can we move on then to the  
 22 Gendarmes?  
 23 **A. Yes.**  
 24 Q. Again, all the questions that?  
 25 THE CORONER: I am so sorry, so regiment of military -- so

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1 this is aside from Gendarmes, regiment of, and how many  
 2 people in a regiment?  
 3 **A. Well, they have -- my understanding is that --**  
 4 MR POPAT: I am very sorry to raise this before Mr Collins  
 5 gives his answer, it may not be clear to you yet but  
 6 there is a statement provided by a BP employee which  
 7 deals with PFD issues and I raise it now only because  
 8 there is some sensitivity about information in relation  
 9 to that being --  
 10 THE CORONER: All right. It was only that I thought we had  
 11 embarked -- then, but anyway. So there has been  
 12 a change, can we put it this way, there has been  
 13 a change so far as the military as opposed to the  
 14 Gendarme are concerned?  
 15 **A. Yes, the military have imposed themselves on to the**  
 16 **site.**  
 17 MR OWEN-THOMAS: I should say my question is related to the  
 18 **militarised zone which is why I didn't continue to ask**  
 19 **in respect of the site itself.**  
 20 **May I move on to the next ring of protection, the**  
 21 **Gendarmes. Again, given the state of security at the**  
 22 **BdV it was important that any armed incursion was**  
 23 **prevented before it got to the gates and the Gendarmes**  
 24 **played a role in that as far as you were concerned?**  
 25 **A. Yes.**

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1 Q. Again, like the military, you cannot tell, you, BP or  
 2 you the JV, or the JV cannot tell the Gendarmes how to  
 3 do their job, they are not contractually bound to you in  
 4 any way?  
 5 **A. That's correct.**  
 6 Q. And you have no control over how many people they use  
 7 and how many people are on the site at any one time?  
 8 **A. The JV doesn't have that control, that's correct.**  
 9 Q. So again, before placing employees on the site you will  
 10 want to satisfy yourselves that the Gendarmes are  
 11 effective and they are going to provide that level of  
 12 security that you hope they will. Is that right?  
 13 **A. Yes.**  
 14 Q. Now obviously if the Gendarmes are in play, to some  
 15 extent that means the military zone has failed because  
 16 they have got as close as the Gendarmes who patrol  
 17 I think about 20 kilometres at most from the site.  
 18 So how many Gendarmes were you told were present at  
 19 the Gendarme camp?  
 20 **A. My understanding was, as we have said many times, 160**  
 21 **were at the Gendarmerie camp at the -- in between the**  
 22 **BdV and the CPF and that the rigs also had a number**  
 23 **which was approximately 30. That was the understanding**  
 24 **I held.**  
 25 Q. In considering your assessment of the viability of the

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1 Gendarmes to provide this inner protection did you  
 2 consider that 160 was sufficient?  
 3 **A. So I took that as being sufficient based around the --**  
 4 **the JV has got a liaison group. The liaison group are**  
 5 **a group of professionals that have experience and they**  
 6 **assess, they coordinate, they liaise with that**  
 7 **Gendarmerie. They never brought anything to me or**  
 8 **through, let's say, Mark, that came to me that suggested**  
 9 **that the Gendarmerie did not have the right capability.**  
 10 **It never came to me through that group.**  
 11 Q. When considering whether to place BP employees in  
 12 Algeria, before you did that did you seek to find out  
 13 how many Gendarmes were there on the base?  
 14 **A. So the deployment -- yes. So the deployment of people**  
 15 **is not something like there is nothing happening and**  
 16 **then suddenly there is a big block of people going. So**  
 17 **we had a presence in In Amenas. BP has had a presence,**  
 18 **Statoil has had a presence, all the other companies that**  
 19 **work for the JV had a presence there for years, several**  
 20 **years, and the assessment of whether someone -- whether**  
 21 **you can continue the presence of people there is an**  
 22 **ongoing risk assessment process. So that assessment**  
 23 **was, as I mentioned, it was -- there was a bi-annual**  
 24 **process. In between the bi-annual cycles there was**  
 25 **constant review of the situation at these sites and it**

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1 **then had a rating of medium and that allowed us to**  
 2 **continue to deploy people to that site. So that's how**  
 3 **this process works.**  
 4 Q. I understand the process. What the family, what  
 5 Mr David Green in particular wants to know is he wants  
 6 to know how you were told these things but what did you  
 7 do to find out. Are there 160 or are the Algerians  
 8 telling us this and there are actually only 40 or 50  
 9 there, so how did you validate it?  
 10 **A. On the Gendarme, so the JV liaison liaised with the**  
 11 **captain, I think they -- I don't know how they count up**  
 12 **the numbers but they have a very good assessment of**  
 13 **numbers. So, for example, they provided catering for**  
 14 **them so there's a catering requirement for the**  
 15 **Gendarmerie. There will be other requirements for the**  
 16 **camp that they need to supply. And in that conversation**  
 17 **they will no doubt talk about the numbers. Obviously**  
 18 **the liaison will observe and they'll observe the numbers**  
 19 **and based around that they will have a rough idea.**  
 20 **They may also, and I don't know, I'm not sort of**  
 21 **pry to these conversations, they'll have**  
 22 **a conversation with the captain and, you know, they may**  
 23 **well ask the captain: how many have you got? And**  
 24 **they'll get an answer.**  
 25 **So that's how they evaluate the number. It is**

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<p>1 <b>professionals trying to assess the situation and</b> 2 <b>evaluate numbers.</b> 3 Q. You raised one matter that I wanted to ask you about. 4 You mentioned the catering requirement. My 5 understanding is that the JV paid for the food for the 6 Gendarmerie, is that right? 7 <b>A. So the JV provides catering for the whole site. And</b> 8 <b>that includes a visitor, a service company, a secondee,</b> 9 <b>BP, Statoil, everybody and the Gendarmerie.</b> 10 Q. The Gendarmes don't come and eat in the canteen in BdV, 11 obviously, we know that. 12 <b>A. That's correct.</b> 13 Q. So they must have their own separate catering 14 allocation? 15 <b>A. My understanding is, yes.</b> 16 Q. And that's the -- the cost of that must be known? 17 <b>A. Not to me, but perhaps to --</b> 18 Q. It must be budgeted for I dare say? 19 <b>A. I dare say it is.</b> 20 Q. Did you check or did you ever cause anyone to check to 21 see whether or not the catering expense matched what you 22 might expect? 23 <b>A. I didn't, no.</b> 24 Q. Obviously the Gendarmes don't work 24 hours a day 7 days 25 a week. So you needed to make sure that 160, or</p> <p style="text-align: center;">Page 225</p>	<p>1 safe as they reasonably can be? 2 <b>A. The JV has an autonomous operating body. The JV is the</b> 3 <b>operator and so they get on with the business of</b> 4 <b>operating. That sort of information is not information</b> 5 <b>that would be in front of myself or other members of the</b> 6 <b>CdG because that is an autonomous part of the operating</b> 7 <b>body itself. To understand the number of cars and the</b> 8 <b>number of people and how long a shift is for the</b> 9 <b>Gendarmerie is not something -- if you talk to security</b> 10 <b>professionals they probably might be able to answer that</b> 11 <b>question.</b> 12 Q. But so far as I can see the security professionals 13 didn't employ Stephen Green. That is right, isn't it? 14 <b>A. The security -- that's correct, yes.</b> 15 Q. It was your organisation that owed a duty to ensure he 16 was as safe as he reasonably could be. What I want to 17 ask is what you did, not the JV, not the CdG but you to 18 ensure your employee is as safe as he could be? 19 <b>A. So the security function, the supports that I get, so</b> 20 <b>I get a lot of functional support in my role, they are</b> 21 <b>closely connected to the liaison teams where BP has been</b> 22 <b>interest in the Sahara and they talk to them and they</b> 23 <b>get assurance about the numbers, the capability and the</b> 24 <b>deployment and the zones and that information comes</b> 25 <b>through the security function and that's how I get the</b></p> <p style="text-align: center;">Page 227</p>
<p>1 whatever the number was, was sufficient that at any one 2 time, any one shift there was sufficient Gendarmes that 3 if that second ring of protection was needed they could 4 deal with an armed terrorist incursion for example. So 5 I would like to ask you what you did to satisfy yourself 6 that at any given time the Gendarmes were sufficient in 7 number to protect the BdV. So how long was a Gendarme 8 shift? 9 <b>A. I don't know.</b> 10 Q. How many people on the shift? 11 <b>A. I don't know.</b> 12 Q. How many vehicles did they use at any one time on shift? 13 <b>A. I don't know. The JV has got a liaison function.</b> 14 Q. No, it doesn't, does it? It contracts with an external 15 company who provide a liaison job. The JV doesn't 16 employ anyone to liaise, isn't that right? 17 <b>A. The JV contracts with AFMC, as you have heard, which is</b> 18 <b>then employees come in and then they go into roles which</b> 19 <b>is collectively known as liaison. That group is a group</b> 20 <b>of professionals from the discipline of security and</b> 21 <b>they are the ones that at the time had close interaction</b> 22 <b>with the Gendarmerie.</b> 23 Q. That doesn't alter the fact that you as an employer 24 wished to ensure, I have no doubt, the safety of your 25 own employees and satisfy yourself that they were as</p> <p style="text-align: center;">Page 226</p>	<p>1 <b>information. But I don't ask for information at the</b> 2 <b>sort of hours per shift number -- et cetera. I just --</b> 3 <b>the conversation never goes to that level.</b> 4 Q. You see, even at 160, assuming three shifts a day, a bit 5 of wastage for sickness and nonattendance, taking out, 6 I think there is one captain and three senior 7 noncommissioned officers, within the -- it leaves 8 something in this region of 30 Gendarmes, rough and 9 ready I make it, assuming three shifts a day. Now, 10 I don't expect you to agree with that or disagree 11 because -- 12 <b>A. Because I don't know.</b> 13 Q. -- it is something I have speculated on. But if it were 14 that would that be insufficient to control night and 15 day, particularly at night, the area that the Gendarmes 16 were supposed to be patrolling, do you think? 17 <b>A. I don't know. I'm not a security expert and, you know,</b> 18 <b>I'd have to then speculate and I wouldn't want to do</b> 19 <b>that. So I just don't know.</b> 20 Q. From your own knowledge and from what you were told you 21 are unable to say with confidence, are you, that the 22 Gendarmes could protect the BdV from an armed terrorist 23 attack? 24 <b>A. I think that's different. I did have confidence that</b> 25 <b>they could do that and that was because the security</b></p> <p style="text-align: center;">Page 228</p>

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<p>1 managers in BP as I have said, had connections with the 2 liaison group, the liaison group knew what was happening 3 on the ground and knew what the deployment and the 4 tactics et cetera were.</p> <p>5 Obviously I had a relationship with Mark who had 6 a relationship with a liaison manager, so he also 7 provided me with a level of assurance that he was 8 getting the protection that he needed.</p> <p>9 Q. You have been asked a little bit about the employee 10 unrest, the drivers strike. Previously I understand 11 there had been some difficulties with the guards and IT 12 staff. They had largely been dealt with. The drivers 13 remained unsatisfied. Is that your understanding? At 14 the time of the attack?</p> <p>15 A. At the time of the attack the strike was over.</p> <p>16 Q. I think it had come back on and gone off again, hadn't 17 it? They remained unsatisfied with their employment 18 position, didn't they, the drivers? They didn't get 19 what they wanted anyway.</p> <p>20 A. As far as I know in the middle of December 2011 the 21 strike was over. I believe over the Christmas/New Year 22 period that there were some people who were on 23 a different shift to the people that had declared the 24 strike to be over, had a difference of opinion with some 25 of the people who had said the strike should be over.</p> <p style="text-align: center;">Page 229</p>	<p>1 investment programme which is, you know, basically 2 around trying to train people in local communities and 3 give them skills so that they can acquire jobs in 4 predominantly the hydrocarbon sector. Prior to that the 5 social investment programme included working in 6 communities, giving women skills to create work and 7 employment in the areas.</p> <p>8 Q. This is in Algeria?</p> <p>9 A. This is in Algeria, in the Sahara, so BP did and does 10 have that programme if that's what you are asking.</p> <p>11 Q. You have no doubt read the witness statements of people 12 who are going to give evidence to this inquest. Some of 13 them suggest that the terrorists were not unwelcome by 14 everyone on that site. Some of them may have been given 15 some assistance by people on the site. Have you read 16 them?</p> <p>17 A. I have read those reports.</p> <p>18 MR OWEN-THOMAS: Thank you, Mr Collins. That is all I want 19 to ask.</p> <p style="text-align: center;">Questions from MS GERRY</p> <p>20 MS GERRY: Mr Collins, can I ask that you have available to 21 you your witness statement provided, not to the police 22 but as we have been referring to them as your civil 23 witness statement and also your exhibits to that and 24 then finally the core bundle. 25</p> <p style="text-align: center;">Page 231</p>
<p>1 And so -- however, the strike did not recommence, they 2 continued to work but there were groups that had 3 grumbles, is my understanding of that situation.</p> <p>4 Q. It is right, isn't it, they didn't get the contract that 5 they sought with Sonatrach?</p> <p>6 A. Yes, I think that is right.</p> <p>7 Q. Was there ever any discussions about the JV employing 8 the drivers?</p> <p>9 A. Yes.</p> <p>10 Q. And they didn't. Why not?</p> <p>11 A. Well, I don't know the details to be honest but I think 12 the JOC explored all opportunities to try to solve the 13 problem. I seem to remember being informed that one 14 option was for the JV to try to find a way to employ 15 them but I don't think that was possible.</p> <p>16 Q. The JV was obviously made up of three organisations, two 17 of whom were not national to Algeria. Yet they were in 18 Algeria, they were processing and profiting from the 19 natural resources of Algeria. Did you give any 20 consideration as to what to do to maintain good 21 relations with those who worked for the JV, on behalf of 22 the JV and the local community generally?</p> <p>23 A. Yes.</p> <p>24 Q. Tell me the outcome of those talks. What did you do?</p> <p>25 A. Yes. So BP alone, not with the JV, has got a social</p> <p style="text-align: center;">Page 230</p>	<p>1 A. Yes, I have got the statement, the exhibits and the 2 bundles.</p> <p>3 Q. Can I then just ask you if you turn to paragraph 38 of 4 your witness statement. I want to ask you some 5 questions around civilian guards. You said when you 6 were answering questions to Mr Ritchie that the 7 protection afforded by the military and by the Gendarmes 8 didn't have to be perfect. He was suggesting to you it 9 had to be perfect and I think your response was it 10 didn't have to be perfect. What I want to explore with 11 you, Mr Collins, is whether that is right given what you 12 had in place at the site and whether given what you had 13 in place meant that there had to be perfection from the 14 military and the Gendarmes. I want to start doing that 15 by dealing with the civilian guards.</p> <p>16 Paragraph 38, you give the reasons why there weren't 17 civilian guards in In Amenas, do you see that?</p> <p>18 A. Yes.</p> <p>19 Q. The first two relate to the facts that there was the 20 militarised zone and the armed military protection zone 21 and the second because you were protected by the 22 Gendarmes. So very much as you say. We don't need 23 armed guards because we have those layers of protection, 24 yes?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 232</p>

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<p>1 Q. The next reasons you give are not, if I may say, related 2 to whether or not they are needed in order to protect 3 the site but are slightly different in terms of 38.3: 4 "The threat of accidental discharge at the Plant or 5 within the living area." 6 The second is: 7 "The practical difficulty of ensuring that civilian 8 armed guards were trained to a sufficiently high 9 standard." 10 And the third: 11 "The practical difficulty of agreeing procedural 12 matters such as orders for opening fire, control and 13 storage of weapons and ammunition." 14 So it is right, isn't it, that in terms of 15 considering the necessity for armed civilian guards in 16 relation to keeping those within the BdV and other sites 17 safe from attacks from outside the only considerations 18 are 38.1 and 38.2 which is the layers that we have 19 talked about; is that right? 20 <b>A. Sorry, that was a long question. So can you just --</b> 21 Q. Would you agree with me that there are two different 22 types of reasons within your paragraph 38 for not arming 23 your civilian guards. The first two relate to the fact 24 that it is not necessary because we have the militarised 25 zone and the Gendarmes, yes? Page 233</p>	<p>1 quote: 2 "Several attempts by local authorities have been 3 made to impose armed guards on project locations. This 4 has been judged as unacceptable on the grounds of 5 ethical issues, associated HSE risks and cost." 6 So my first question is what were these several 7 attempts and who were the local authorities and why were 8 they trying to get you to attempt to use armed guards? 9 <b>A. So, I think the first part was who were the several 10 attempts and the local authorities. Is that -- I think 11 this is a JV document, I believe.</b> 12 Q. If you would like to take it, it is in the core 13 bundle behind tab 11 and this quote is taken from 14 page 97. 15 <b>A. Okay, let's have a look.</b> 16 Q. Core bundle 1, tab 11 and it is the BP/Statoil/Sonatrach 17 security management plan December 2012? 18 <b>A. Yes.</b> 19 Q. Would you go forward to page 97 at the bottom of page 8, 20 the internal pagination? 21 <b>A. Okay.</b> 22 Q. You see at the top of the page, the second paragraph: 23 "Comment on civilian armed guards. Several attempts 24 by local authorities have been made to impose armed 25 guards on project locations. This has been judged as Page 235</p>
<p>1 <b>A. Broadly, yes.</b> 2 Q. And then the next three are in relation to the practical 3 difficulties of arming civilian guards and the threat of 4 accidental discharge? 5 <b>A. Yes.</b> 6 Q. So it is fair to say, isn't it, that in terms of 7 considering the necessity of arming your civilian guards 8 because of the threat faced the only reasons you say it 9 wasn't necessary is because of the militarised zone and 10 because of the Gendarmes? 11 <b>A. Well, it was a combination of all of them.</b> 12 Q. In terms of meeting the threat of an attack from outside 13 on the base the only reasons you say they are not 14 necessary is because of the militarised zone and the 15 Gendarmes. The other reasons are to do with 16 practicalities and accidental discharge within the 17 plant? 18 <b>A. I think it's -- that's fair to say that.</b> 19 Q. Moving on then -- 20 THE CORONER: Sorry, I am not sure he had quite finished. 21 Had you? 22 <b>A. What I was going to say was -- no, I think that's fair.</b> 23 MS GERRY: Moving on then to paragraph 39. You make 24 reference there to being shown a copy of the security 25 management plan sorry from December 2012 where you Page 234</p>	<p>1 unacceptable on grounds of ethical issues associated 2 [and I'm reading HSE as health and safety] risks and 3 cost." 4 <b>A. Yes.</b> 5 Q. So the question I asked you is can you tell us what 6 those attempts were and why and who the local 7 authorities were? 8 <b>A. I don't know what they were.</b> 9 Q. Moving on to paragraph 42 you then make specific 10 reference to what was happening at In Salah gas sites 11 and the issue of civilian armed guards. Paragraph 42: 12 "I am also aware that during 2011 - 2012 the issue 13 of using civilian armed guards rose in respect of the 14 In Salah Gas sites, where, as explained above, the 15 military is responsible for guarding the sites. As 16 I understand it. 17 "42.1: 18 "Beginning in approximately March 2011, authorities 19 began raising the idea of possibly using armed guards to 20 support the military. They did this verbally. Although 21 the In Salah Gas JV did not receive a formal request for 22 civilian armed guards to be used, it was told about 23 concerns that demands at that time on the region's 24 military to send troops to the Libyan border (in 25 response to the situation in Libya in early 2011) might Page 236</p>

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<p>1 affect the military's ability to provide sufficient 2 numbers of military for In Salah, particularly at the 3 southern fields." 4 You then go on to explain that you suggested the JV 5 personnel explained why the use of civilian guards was 6 not acceptable to BP and I assume that is going back to 7 the ethical health and safety reasons and you considered 8 there were other solutions to the military's resourcing 9 concerns that would not involve using armed guards. 10 It then seems, if we go over the page, that another 11 solution is found and in the end for whatever reason: 12 "The In Salah Gas JV did not agree to use civilian 13 armed guards, and they were not used." 14 So again, here we have reference to authorities and 15 to requests for projects to use armed guards. So again, 16 my question is: who are the authorities? 17 <b>A. So this one is about In Salah and the previous one was</b> 18 <b>about In Amenas?</b> 19 Q. Well, no, the other one just said projects to be fair. 20 <b>A. I think it is the In Amenas JV security plan though,</b> 21 <b>isn't it?</b> 22 Q. It was within that plan that it says: 23 "Several attempts by local authorities have been 24 made to impose armed guards on project locations." 25 It didn't specify In Amenas. Page 237</p>	<p>1 authorities because they are concerned the military 2 aren't going to be able to provide the necessary 3 services. If you read it it says: 4 "It might affect the military's ability to provide 5 sufficient numbers of military for In Salah particularly 6 at the southern fields." 7 The reason for that being that the military are 8 required elsewhere to deal with the situation in Libya. 9 So this reads like there are authorities coming and 10 saying, look our military are going to be needed at the 11 Libyan border. That means we may not have the troops 12 that we need or we were -- we need to provide and so we 13 are suggesting you have armed guards? 14 <b>A. Yes, so what happened in this case is -- so the liaison</b> 15 <b>team for In Salah went to speak to, I am not quite sure</b> 16 <b>who it was that they would have been speaking to, they</b> 17 <b>would probably have been speaking to the military to say</b> 18 <b>that, you know, it would be much better if the military</b> 19 <b>provide the protection for the rig sites and the project</b> 20 <b>sites which is what this was about in In Salah. And</b> 21 <b>eventually they agreed to allow the sites to mobilise</b> 22 <b>and to mobilise military and not have civil armed</b> 23 <b>guards. Because the JV's approach was it's much better</b> 24 <b>to have the military who are trained in weapons, they</b> 25 <b>have an engagement of rules in terms of ordering and</b> Page 239</p>
<p>1 <b>A. So what was in the JV security plan, I don't know what,</b> 2 <b>because I didn't write it. It didn't come to me. I</b> 3 <b>honestly don't know that is. In terms of this in my</b> 4 <b>statement, I believe in this case the authorities,</b> 5 <b>I can't remember, I would have to -- liaison people</b> 6 <b>brought that information to us. The authorities,</b> 7 <b>I think in this case were a division of Sonatrach</b> 8 <b>security had asked for when they -- when the southern</b> 9 <b>fields project was mobilising in In Salah they were</b> 10 <b>taking on new sites and the authorities in those sites</b> 11 <b>said they should have civil armed guards.</b> 12 Q. When are you talking about here? 13 <b>A. Where?</b> 14 Q. When? 15 <b>A. When? Well it's approximately March 2011 I think is</b> 16 <b>the --</b> 17 Q. So it is at this time. 18 <b>A. So liaison went to talk to them to explain well, does</b> 19 <b>that mean we're not going to get the military</b> 20 <b>protection? Because that is also another factor which</b> 21 <b>is if a site is forced to get the civil armed guards</b> 22 <b>they may -- they are concerned that they won't get the</b> 23 <b>military protection. So --</b> 24 Q. That puts this the wrong way round because reading your 25 42.1 it reads as if the concern is being raised by the Page 238</p>	<p>1 <b>firing and they have storage facilities. They're</b> 2 <b>equipped for handling weapons. And so that dialogue was</b> 3 <b>engaged and conveyed and as a result of that -- remember</b> 4 <b>this was a new area that they were opening up.</b> 5 Q. Sure. If I may summarise what I think then you are 6 saying. There were approaches made by the authorities. 7 Concern had been raised by the military that they 8 wouldn't be able to provide numbers sufficient to 9 protect the area and therefore they thought there would 10 be the need for an additional consideration of armed 11 civilian guards. The response to that from Sonatrach or 12 the JV, whoever it was, actually we think you're better 13 doing it than armed civilian guards so although you are 14 telling us you may not have sufficient numbers you had 15 better find sufficient numbers because we are not going 16 to arm? 17 <b>A. Because we were not going to mobilise so the JV didn't</b> 18 <b>mobilise until there was -- until liaison informed the</b> 19 <b>JV that there was sufficient protection.</b> 20 Q. The reason why you give at 42.2: 21 "JV personnel explained why the use of civilian 22 armed guards would not be acceptable to BP and Statoil 23 and suggested there are other solutions to the 24 military's resourcing concerns that would not involve 25 using armed guards." Page 240</p>

<p>1 Is that accurate?</p> <p>2 <b>A. Yes, that's accurate.</b></p> <p>3 Q. It is also costs obviously identified in that quote that</p> <p>4 we have just been looking at and you deal with that in</p> <p>5 paragraph 40:</p> <p>6 "Although there would be some additional cost in</p> <p>7 training civilian guards in the use of weapons, and in</p> <p>8 implementing the stringent control measures that would</p> <p>9 be required on access to and use of weapons, I would not</p> <p>10 think such costs would be excessive, and I am not aware</p> <p>11 that cost was raised as a reason for not having armed</p> <p>12 guards at In Amenas."</p> <p>13 Do you see that?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. There you seem to be saying that if your reasons at</p> <p>16 38.4:</p> <p>17 "The practical difficulty of ensuring that civilian</p> <p>18 armed guards were trained to a sufficiently high</p> <p>19 standard."</p> <p>20 And your reason at 38.5:</p> <p>21 "The practical difficulty of agreeing procedural</p> <p>22 matters such as orders for opening fire, control and</p> <p>23 storage of weapons."</p> <p>24 If you felt it was necessary to have armed guards</p> <p>25 those things could and would, wouldn't they, have been</p> <p style="text-align: center;">Page 241</p>	<p>1 protection by the military zone and the Gendarmes in</p> <p>2 patrolling the area is La Recule. When somebody gets to</p> <p>3 VCP1 there is no armed guard there?</p> <p>4 <b>A. La Recule is at the junction. But the -- In Amenas is</b></p> <p>5 <b>protected by the military --</b></p> <p>6 Q. We know that.</p> <p>7 <b>A. So that military just has to be effective. It doesn't</b></p> <p>8 <b>have to be perfect. It has to be effective in what it's</b></p> <p>9 <b>supposed to do to patrol --</b></p> <p>10 Q. But if it is not perfect?</p> <p>11 <b>A. If it's not perfect it just needs to be effective.</b></p> <p>12 Q. You cannot sit there and say: I can guarantee that the</p> <p>13 military zone and the patrols by the Gendarmes in the</p> <p>14 area outside BdV and CPF were perfect?</p> <p>15 <b>A. No.</b></p> <p>16 Q. So therefore we didn't need to worry about what would</p> <p>17 happen if somebody got through there?</p> <p>18 <b>A. No, you can't say perfect but you have to look at what's</b></p> <p>19 <b>probable and what's probable is that the military will</b></p> <p>20 <b>intercept people in that zone. There is evidence of</b></p> <p>21 <b>them doing that all over the country. There's many</b></p> <p>22 <b>interceptions that the military make. They have to be</b></p> <p>23 <b>effective and you have to consider a sort of probable</b></p> <p>24 <b>scenario. Rather than a perfect world scenario where</b></p> <p>25 <b>a large group can travel across quite a long distance.</b></p> <p style="text-align: center;">Page 243</p>
<p>1 overcome although it may have been at cost but that</p> <p>2 presumably would have been one you would be willing to</p> <p>3 bear?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. The decision was taken not to have armed civilian guards</p> <p>6 at In Amenas and the effect of that, is it not, in terms</p> <p>7 of looking at your layers is the last layer of</p> <p>8 protection where there was any armed deterrents was at</p> <p>9 La Recule, somebody approached the In Amenas site, once</p> <p>10 they get to VCP1, no armed guards?</p> <p>11 <b>A. That's inside the Gendarmerie zone though so they have</b></p> <p>12 <b>to face --</b></p> <p>13 Q. I am really being very specific. I am talking about</p> <p>14 civilian armed guards. There are no armed guards at all</p> <p>15 at VCP1, are there?</p> <p>16 <b>A. There are no civilian armed guards at VCP1. Sometimes</b></p> <p>17 <b>there are Gendarmerie at VCP1.</b></p> <p>18 Q. The decision had been made that there was no requirement</p> <p>19 to have an armed guard, be it Gendarme or be it civilian</p> <p>20 armed guard, at VCP1 as a general rule?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. There may have been one there occasionally but that was</p> <p>23 not a specified condition?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. So your last layer of protection if there is not perfect</p> <p style="text-align: center;">Page 242</p>	<p>1 <b>It is quite extreme and so you have to look at the</b></p> <p>2 <b>probable scenario.</b></p> <p>3 Q. Putting an armed guard at VCP1 would not have been</p> <p>4 a difficult thing to do, would it?</p> <p>5 <b>A. Well, there were --</b></p> <p>6 Q. No, having a specific requirement not just on occasion,</p> <p>7 just if there happens to be a Gendarme there, just</p> <p>8 because there happens to be an escort going out, not</p> <p>9 specifically or it wouldn't have been difficult, would</p> <p>10 it, to specify that there should be an armed guard at</p> <p>11 VCP1?</p> <p>12 <b>A. Yes, I accept that.</b></p> <p>13 Q. In terms of -- just very briefly, the gate at BdV.</p> <p>14 I was asking Mr Cobb yesterday about why it was the case</p> <p>15 there wasn't an electronic gate or an automatic gate</p> <p>16 that could be operated from inside the guardhouse. He</p> <p>17 said because they didn't want to discourage the guards</p> <p>18 coming out and checking physically the vehicles. So</p> <p>19 they had to come out and physically close the gate.</p> <p>20 Okay?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. The converse of that is that if there is a guard sitting</p> <p>23 in the guardhouse and the gate is open, as it was</p> <p>24 regularly in the mornings, and sigh sees a group of</p> <p>25 terrorists approaching he is unable, from the protection</p> <p style="text-align: center;">Page 244</p>

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<p>1 of his guardhouse, to hit a button and the door to</p> <p>2 close. He has to get out of his guardhouse, put himself</p> <p>3 in front of the oncoming terrorists and slide it across,</p> <p>4 yes?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. So in terms of your layers of protection, we are now</p> <p>7 faced if the guards get through VCP1 and they are coming</p> <p>8 towards the BdV, your security guards are told if there</p> <p>9 is an emergency and alarm close the gates. In that</p> <p>10 situation they have to get out of their guardhouse, put</p> <p>11 themselves in danger and shut the gates. That is</p> <p>12 another layer of protection that is incredibly weak and</p> <p>13 relied upon perfection in terms of the military zone and</p> <p>14 the Gendarmes patrolling the area.</p> <p>15 <b>A. The gate would normally be closed and beyond that there</b></p> <p>16 <b>is another which is also closed. So the gate would</b></p> <p>17 <b>normally be closed so they wouldn't have to go out and</b></p> <p>18 <b>close the gate.</b></p> <p>19 Q. We have heard though that it wasn't and it was left open</p> <p>20 and we know it was left open after the convoy, the bus</p> <p>21 left the BdV area. It was left open for periods of time</p> <p>22 in the morning. We have also heard there are</p> <p>23 difficulties with it not being closed. That aside</p> <p>24 though, would you agree with me that if you had an</p> <p>25 automated button that could be pressed inside the</p> <p style="text-align: center;">Page 245</p>	<p>1 INDEX</p> <p>2 MR MARK EDWARD COBB (continued) .....1</p> <p>3 Questions from MR POPAT (continued) .....1</p> <p>4 MR ANDREW COLLINS (sworn) .....136</p> <p>5 Questions from MR UNDERWOOD .....136</p> <p>6 Questions from MR RITCHIE .....172</p> <p>7 Questions from MR OWEN-THOMAS .....207</p> <p>8 Questions from MS GERRY .....231</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: center;">Page 247</p>
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<p>1 guardhouse that would be a more effective way of at</p> <p>2 least buying time and putting an additional barrier in</p> <p>3 to the terrorists coming into the BdV?</p> <p>4 <b>A. Yes, but there was time because from the VCP to the BdV</b></p> <p>5 <b>there is about 0.7 of a kilometre. There is time if</b></p> <p>6 <b>somebody comes across that area, there is time if that</b></p> <p>7 <b>gate just happened to be open at that particular time</b></p> <p>8 <b>there is time to close it but I take your --</b></p> <p>9 Q. That would be relying on somebody at VCP1 making</p> <p>10 a telephone call or somehow contacting the guard at BdV</p> <p>11 saying "hey, there are some guys coming in here. They</p> <p>12 have got heavy weapons, you had better shut that door",</p> <p>13 and that is assuming the person at VCP1 hasn't been</p> <p>14 killed?</p> <p>15 <b>A. It does rely upon a communication.</b></p> <p>16 THE CORONER: All right, I am just mindful of the time.</p> <p>17 MS GERRY: Sorry, sir.</p> <p>18 THE CORONER: Not at all. You have been in the witness box</p> <p>19 a long time so I am grateful to you for staying late but</p> <p>20 we are going to break off now and 9.30, please tomorrow</p> <p>21 morning.</p> <p>22 (5.30 pm)</p> <p>23 (The inquest adjourned until the following day at 9.30 am)</p> <p>24</p> <p>25</p> <p style="text-align: center;">Page 246</p>	
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