

<p>1 Wednesday, 1 October 2014 2 (2.00 pm) 3 THE CORONER: Mr Laidlaw, just before I forget, on the point 4 about the powers to compel production of this material, 5 I appreciate there will be other things going on in the 6 background or there may be, that may affect things 7 finally. What impression I get so far is that I don't 8 think anything will change from your point of view but 9 I may be quite wrong, we'll see. But I really want, 10 this week, your submissions on what powers I have. It 11 is a very short point. 12 MR LAIDLAW: No. No, absolutely, sir. Can I just give you 13 in a moment something about timetable so you and the 14 other interested persons can understand our position. 15 I am afraid decision makers at Statoil are literally 16 spread far and wide at the moment. They are coming 17 together this evening and tomorrow, so I will have some 18 instructions in respect of the requests that you made of 19 us yesterday, sir, and on the wider matters because you 20 will appreciate that further submissions consistent with 21 the order you have made have been submitted during the 22 course of the morning. 23 So I will not realistically be able to produce 24 submissions of the sort you have requested until the 25 weekend. In other words, they'll be done and with</p> <p style="text-align: center;">Page 1</p>	<p>1 need to see what they are and how extensive they are. 2 I don't know how difficult they are to deal with. 3 MR LAIDLAW: I can certainly give you two or three of the 4 printed versions that I have been given in the last few 5 minutes if that assists. 6 THE CORONER: It is simply this: if there is a lot that I am 7 going to need to think about I want to have the weekend 8 for me as it were, to do that rather than everybody else 9 doing their submissions. I want that time. So 10 unless -- if they are very extensive then, fine, Monday, 11 but if they are not very extensive it wouldn't be 12 possible to do something by the close of play on Friday? 13 MR LAIDLAW: I will certainly do my best. There is, as I 14 say, a real logistical problem. 15 THE CORONER: I was meaning really what you say about the 16 law really. 17 MR LAIDLAW: These are not confined just to the legal 18 principles but to various requests which do require me 19 to take instructions. 20 THE CORONER: Yes, I can see that. All right. If I have 21 a look at those then I will be better informed but 22 I know we have them. I will try and look at them in the 23 break this afternoon. I am very grateful, yes. 24 MS DOLAN: Sir, the next witness is Mr Lawlor. 25</p> <p style="text-align: center;">Page 3</p>
<p>1 people over the weekend. I think that's inevitably 2 going to lead to -- 3 THE CORONER: I want the weekend to think about it. All 4 I want from you -- more by Monday but what I want before 5 we get to the weekend is what you say about what power 6 there is or is not -- 7 MR LAIDLAW: To. 8 THE CORONER: -- for me to compel the production of that 9 material to myself. Just that. It is a very short 10 point. 11 MR LAIDLAW: We can certainly deal with that by -- 12 THE CORONER: Friday at 2.00 pm? 13 MR LAIDLAW: Yes, we can do that. Can I look to the wider 14 points as well because I am keen to tease all the points 15 out, as it were, so we don't continually return to these 16 issues? 17 THE CORONER: Yes. 18 MR LAIDLAW: Would you allow us until the end of the weekend 19 to address other matters which arise from the further 20 submissions other IPs have made? 21 THE CORONER: Yes, are those in documents I don't think 22 I have seen yet? 23 MR LAIDLAW: They have been coming through literally during 24 the course of the last hours. 25 THE CORONER: The answer is probably but I am just going to</p> <p style="text-align: center;">Page 2</p>	<p>1 MR NORMAN LAWLOR (sworn) 2 Questions from MS DOLAN 3 THE CORONER: Good afternoon. 4 MS DOLAN: Good afternoon. Mr Lawlor. 5 A. Hello. 6 Q. My name is Bridget Dolan and I ask questions on behalf 7 of the coroner. 8 A. Okay. 9 Q. Can you give us your full name, please? 10 A. Norman David Lawlor. 11 Q. And I think you worked in In Amenas gas facility? 12 A. That's correct, yes. 13 Q. In what capacity did you work? 14 A. I was the operations liaison coordinator. 15 Q. And who employed you? 16 A. Sterling Facilities. 17 Q. What were your duties as the I think OLC it is known as, 18 is it not? 19 A. Yes. 20 Q. What were your duties? 21 A. Principally it was to be liaison for the expat staff and 22 also initially the job constructed of being in charge of 23 the guard force et cetera and the drivers who were on 24 site as well. 25 Q. You say in charge of the guard force. We have heard</p> <p style="text-align: center;">Page 4</p>

1 from Mr Fitzpatrick who I understand was a tier above
 2 you --
 3 **A. Yes.**
 4 Q. -- in the hierarchy, that his level, the OLS, the
 5 supervisors, were in charge of the guard force until
 6 things changed. Did you consider that you were also in
 7 that role?
 8 **A. Yes. My position, we dealt with the day-to-day**
 9 **management of them. Fitz -- sorry, Anthony Fitzpatrick**
 10 **was the overall supervisor so he overseen the whole**
 11 **project.**
 12 Q. And you said "we", who was your back-to-back worker?
 13 **A. Yann Desyeux.**
 14 Q. Did you have any interaction with the Gendarmes at
 15 In Amenas?
 16 **A. I attended sometimes meetings with Paul Morgan and**
 17 **Anthony Fitzpatrick from time to time in the Gendarmerie**
 18 **camp. It wasn't on a regular basis. It was just**
 19 **sometimes I would go over to the meetings to meet the**
 20 **captain et cetera.**
 21 Q. It sounds from what you say that that liaison between
 22 the Gendarmes and your team was more done by Mr Morgan?
 23 **A. Yes, they had more regular contact.**
 24 Q. Can you help us with about how many people were on site
 25 at In Amenas at any one time?

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1 **A. Expat or national?**
 2 Q. Both. Start with the expats.
 3 **A. Gosh, I think there was about 5 to 600 national,**
 4 **Algerian nationals. Expats would range from roughly 120**
 5 **I think. These aren't accurate figures.**
 6 Q. Would it help you to look at your statement. If I tell
 7 you the figures that you said back in January 2013 was
 8 that there was normally between 65 to 85 expats on site
 9 and about 700 nationals. Are you able to help us with
 10 what's more accurate?
 11 **A. At that time due to the ongoing dispute the nationals**
 12 **were higher.**
 13 Q. Sorry, I asked about normally. We have heard about the
 14 drivers strike but we understand that that is over with
 15 by the time January came around, so I am more interested
 16 in what's the normal level?
 17 **A. The normal level would be, just depending on operations**
 18 **actually at the time, I've said here 65 to 85 so**
 19 **probably, that's probably about an accurate figure, yes.**
 20 Q. And nationals you thought in January there were about
 21 700. Is that about right?
 22 **A. There was probably between 5 to 600 nationals at any**
 23 **given time.**
 24 Q. And we have heard about the strike that happened in
 25 2012?

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1 **A. Yes.**
 2 Q. How many of the nationals went on strike in your
 3 estimate?
 4 **A. It varied. I think -- I don't know the accurate**
 5 **numbers, but certainly they used to gather at the front**
 6 **of the camp. There could be any numbers between 10 to**
 7 **20 to 50 if they were having a meeting at any one given**
 8 **time.**
 9 Q. In your witness statement you said there were 200
 10 nationals on strike.
 11 **A. Right.**
 12 Q. Does that --
 13 **A. Well that's going by what I have probably been told by**
 14 **the national staff who were there at the time.**
 15 Q. When expat workers began working at the plant what kind
 16 of briefings did they have?
 17 **A. They were given a thorough briefing on the actual area**
 18 **where they were and they were given a security induction**
 19 **on the alarm systems that we had in place.**
 20 Q. Who would deliver that?
 21 **A. It would be myself. And well my back-to-back at that**
 22 **time was Yann.**
 23 Q. And what information did you give people about security
 24 issues?
 25 **A. They were given -- you see it was laid out in the office**

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1 **within -- there was like several different maps actually**
 2 **up on the walls and what we had was a format where you**
 3 **actually explained in the country of where they were,**
 4 **the distances between In Amenas and where the main**
 5 **headquarters up in Hassi Messaoud were. Then they were**
 6 **given an actual country-wise, the different various**
 7 **countries that bordered Algeria. They were also**
 8 **given --**
 9 Q. Sorry, you are just describing, you told them about the
 10 geography. Did you tell them anything about the
 11 relevance of that geography?
 12 **A. We explained to them obviously in the security part of**
 13 **it where the main terrorist activities were in Algeria**
 14 **at that time and also explained to them at that time**
 15 **because of the Libyan situation and also because of the**
 16 **ongoing threat from Mali and Niger. From there they**
 17 **were then given a brief camp layout.**
 18 Q. Sorry, if I can just pause you there. You said you
 19 explained about the Libyan situation and Niger. What
 20 was it that you said to people about it?
 21 **A. Basically we explained how the Libyan threat was still**
 22 **ongoing. Niger was mostly to do with the smuggling and**
 23 **banditry that was passed up through the In Amenas**
 24 **district at that time.**
 25 Q. Did you say anything to them about the relevance it

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<p>1 therefore had for them?</p> <p>2 A. Just that that's what we're doing, the current situation</p> <p>3 was in and around Algeria at the time.</p> <p>4 Q. Sorry, then I interrupted you. You were continuing to</p> <p>5 talk about the security briefing.</p> <p>6 A. Yes, then from that we then explained to them the actual</p> <p>7 layouts of the camp, where the muster points were, where</p> <p>8 the access points were. Those were explained to them,</p> <p>9 the alarm signals. What type of alarm signal</p> <p>10 represented what. What they should do when they ever</p> <p>11 heard the alarm signals.</p> <p>12 Q. What were they told to do if they heard the alarms?</p> <p>13 A. Well we had two alarm signals. A general muster, a fire</p> <p>14 alarm and we also had a security alarm signal. For the</p> <p>15 general fire muster alarm they were told where the</p> <p>16 general muster points were and they were also explained</p> <p>17 to when the security alarm was, of what their actions on</p> <p>18 and what they should do if they heard the alarm.</p> <p>19 Q. Were any drills done in respect of these alarms.</p> <p>20 A. There was general muster fire alarms done regularly and</p> <p>21 the alarm was actually tested once a week.</p> <p>22 Q. You haven't mentioned the security alarm ever being</p> <p>23 tested as a different kind of drill. Did that ever</p> <p>24 happen when you were there?</p> <p>25 A. The actual alarm was tested on a weekly basis and that</p> <p style="text-align: center;">Page 9</p>	<p>1 Q. Around about what time was that?</p> <p>2 A. Gosh, I think it was about 9 o'clock back -- 9,</p> <p>3 10 o'clock Spanish time.</p> <p>4 Q. Then I think there was a time when you spoke to Yann?</p> <p>5 A. I didn't speak to Yann. I sent Yann a text message and</p> <p>6 the response I got back from him was that he had been</p> <p>7 taken hostage.</p> <p>8 Q. When did you send that message to him? Was that shortly</p> <p>9 after you contacted Ian or --</p> <p>10 A. Yes. It was immediately after speaking to Ian.</p> <p>11 Q. So if you were right about the time that would be round</p> <p>12 about 9 o'clock?</p> <p>13 A. Yes, I think so.</p> <p>14 Q. And he said he had been taken hostage. Did you learn</p> <p>15 any more from him?</p> <p>16 A. No.</p> <p>17 Q. Did you recall he sent you a message which told you who</p> <p>18 had been taken hostage?</p> <p>19 A. This was Yann. His reply was "hostage" and that was it.</p> <p>20 Q. When you made your statement back in January, over</p> <p>21 a year ago, you said he sent back another message which</p> <p>22 said "Me, leader and 13", do you recall that?</p> <p>23 A. I can't recall. I'm just reading it in my statement</p> <p>24 now.</p> <p>25 Q. Does that jog your memory at all?</p> <p style="text-align: center;">Page 11</p>
<p>1 was always announced as being a test and --</p> <p>2 Q. But people's response to it, was that ever tested?</p> <p>3 A. No. No, not that I can recollect.</p> <p>4 Q. Sorry, I don't think I asked you, when did you first</p> <p>5 start working at the plant?</p> <p>6 A. I think it was -- I arrived in, gosh, 2005 I arrived.</p> <p>7 At that time it was the construction and then I moved</p> <p>8 from there on to drilling and then I think it was around</p> <p>9 2011, November 2011 I think it was I moved up to the</p> <p>10 actual CPF facilities.</p> <p>11 Q. I think when the incident actually happened you weren't</p> <p>12 rostered on it was Yann Desyeux who was present at the</p> <p>13 site when the incident happened?</p> <p>14 A. That's correct, yes.</p> <p>15 Q. When did you first learn of what was happening on</p> <p>16 16 January?</p> <p>17 A. I was actually in Spain and I got contacted by Ian</p> <p>18 Strachan who had telephoned me to tell me that the camp</p> <p>19 was under attack.</p> <p>20 Q. Was he at the camp at the time?</p> <p>21 A. Yes and he asked me what -- he was with Darren Matthews</p> <p>22 at the time and he asked me what they should do.</p> <p>23 Basically I told him what they had been instructed to</p> <p>24 do. Go to the cabin and lock the door and don't answer</p> <p>25 the door.</p> <p style="text-align: center;">Page 10</p>	<p>1 A. No, I'm sorry.</p> <p>2 Q. Can I just ask you about the Gendarmes and Gendarme</p> <p>3 patrols?</p> <p>4 A. Mmm.</p> <p>5 Q. Did you see Gendarmes patrolling in the camp area?</p> <p>6 A. Not within the camp. They were always out external from</p> <p>7 the camp.</p> <p>8 Q. When you say external, where would they patrol?</p> <p>9 A. You would possibly see them from time to time actually</p> <p>10 driving round the actual back of the camp over towards</p> <p>11 what was the falaise area. You would also see them from</p> <p>12 time to time driving up and down the actual main route</p> <p>13 up and down to the CPF or the processing facility and</p> <p>14 sometimes actually round the back of the processing</p> <p>15 facility as well.</p> <p>16 Q. And how frequently did you see that? See them out</p> <p>17 patrolling?</p> <p>18 A. I couldn't answer how often I've seen it.</p> <p>19 Q. Were you aware of how many patrol vehicles they had at</p> <p>20 daytime and night time?</p> <p>21 A. Daytime, I think they were sent over about, I think it</p> <p>22 was between 9 and 10 I think, off the top of my head.</p> <p>23 Night time I think they had five vehicles. Again, this</p> <p>24 is -- I think it was about five vehicles they had at</p> <p>25 night time.</p> <p style="text-align: center;">Page 12</p>

1 Q. Was it any part of your role to know if they were
 2 patrolling or know if drivers were provided for them?
 3 **A. No, we weren't allow to interfere with the Gendarme.**
 4 Q. How often did you go outside of the camp, say, away from
 5 the BdV, CPF, the road between into the desert around
 6 it?
 7 **A. Sometimes -- it just depended on what my duties were.**
 8 **Sometimes I would just go for a drive, driving round the**
 9 **back of the facilities et cetera as well, just having**
 10 **a general look around, making sure nothing was untoward.**
 11 Q. And you were allowed to do that in your role -- was that
 12 escorted or unescorted?
 13 **A. That was unescorted.**
 14 Q. In what kind of vehicle was that?
 15 **A. In a Landcruiser.**
 16 Q. In a 4 x 4?
 17 **A. Yeah.**
 18 Q. And when you say you could go for a general drive, how
 19 far away from say the perimeter fence would you be
 20 talking about driving?
 21 **A. Well, there was an actual track, on the BdV there was**
 22 **a track that went round the actual facility and same**
 23 **went down to what was the compression site, there was**
 24 **a track that went round the back of it.**
 25 Q. Would it help to have a picture to look at to explain?
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1 Are you happy to tell us with that one?
 2 **A. Yes.**
 3 Q. Does that help you?
 4 **A. Yes.**
 5 Q. It is not the one we are looking for but we'll go for
 6 that. Does it have a number on the top?
 7 **A. No, there's nothing on there.**
 8 Q. It is a map of the whole site with the labels?
 9 **A. Yes.**
 10 Q. What was it you wanted to explain using this?
 11 **A. Right, there was a track to the right-hand side, you**
 12 **will see it on the aerial photo for the BdV Compression**
 13 **Project camp.**
 14 Q. So that's?
 15 **A. That track went all the way round the back of the camp**
 16 **and it allowed you to come round the left-hand side to**
 17 **the company camp extension area.**
 18 Q. So you could do a complete circle round the perimeter?
 19 **A. Yes, and from there I could go down to where the**
 20 **Compression Project lay down yard is on your route down**
 21 **towards the CPF.**
 22 Q. So this is again, if one goes up the main road from the
 23 living area towards the CPF you can see the lay down
 24 yard Compression Project offices on the left?
 25 **A. Yes, there was again a track that allowed you to go**
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1 **round behind that whole yard area and sometimes because**
 2 **there was work ongoing down in the CPF I would actually**
 3 **go into where the guards were and just ask them if**
 4 **everything was fine et cetera. Then I would just carry**
 5 **on and drive down towards where your marker is for the**
 6 **IBO, there is again a track that goes right round the**
 7 **back of the CPF facility and normally from there I sort**
 8 **of normally just turn around and maybe head back up to**
 9 **the camp.**
 10 Q. Are these tracks easily passable in 4 by 4s?
 11 **A. Yes.**
 12 Q. Did you ever go any further out into the field?
 13 **A. No, you weren't allowed without an escort.**
 14 Q. With an escort did you go further?
 15 **A. Sometimes I'd take, go actually down to the rig site**
 16 **that was operating at the time on -- not on a daily**
 17 **basis. Maybe on a weekly basis.**
 18 Q. We can see the two tracks that are marked trunk line 5
 19 and trunk line 6 that cross from east to west on this.
 20 **A. Yes.**
 21 Q. Are they vehicle tracks?
 22 **A. Yes.**
 23 Q. Are you able to help us generally with how driveable the
 24 desert was in the area around the camp and out to the
 25 rigs?
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1 **A. Well, trunk line 5 and trunk line 6 are actually**
 2 **bulldozed roads. They are constructed roads, they are**
 3 **not just tyre tracks, they are actually constructed**
 4 **road.**
 5 Q. And if one wants to come off those I suppose unmetalled
 6 roads we can call them, sometimes they're call pistes?
 7 **A. Yes.**
 8 Q. Which are the unmetalled but clearly defined routes. If
 9 one wanted to not use one of those and drive across the
 10 desert surface how passable was that in a 4 by 4?
 11 **A. Easily.**
 12 Q. And when you are talking about going to the rigs what
 13 distance from the main complex were some of those rigs?
 14 **A. I think the distance was about 25 kilometres southwest**
 15 **of where the CPF is.**
 16 Q. And again, the deserts, going in by those routes was
 17 that easily driveable if one didn't have the bulldozed
 18 tracks?
 19 **A. No, sometimes there was tracks going all over the**
 20 **desert. Sometimes there was actually designated tracks.**
 21 MS DOLAN: Thank you. I have no more for you.
 22 Questions from MR PERFECT
 23 MR PERFECT: Good afternoon, Mr Lawlor. My name is Andrew
 24 Perfect, I represent the family of Stephen Green. If
 25 I may start by asking you what is your background, the
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<p>1 job that you held perhaps in years prior to starting 2 with AFMC? 3 A. Prior to working in Algeria is that what you mean? 4 Q. Generally, we have understood so far all the other 5 people at AFMC were professional soldiers so effectively 6 I am asking you is were you a professional soldier? 7 A. Yes. 8 Q. With whom? 9 A. I was with the parachute regiment. 10 Q. For how long? 11 A. Eight years. 12 Q. Your time in Algeria, were you aware whilst working with 13 AFMC of the worsening security situation, if I can call 14 it that? 15 A. I wouldn't say it was a worsening situation. I think it 16 was always there. 17 Q. So it seems to me there are three separate sort of 18 features to it. You have the issues going on around 19 Niger, Libya and Mali. There's also been the issue with 20 the strike in 2012 and there has been the change, 21 a significant change in how you did your job effectively 22 with the shift to the SSI? 23 A. Yes. 24 Q. So was there talk generally within AFMC between you and 25 your back-to-back, your superiors, Mr Fitzpatrick,</p> <p style="text-align: center;">Page 17</p>	<p>1 Mr Fitzpatrick were effectively above you, they were 2 your line managers? 3 A. Yes, that's correct. 4 Q. Now, obviously that kind of relationship is both 5 a formal line management relationship but it seems you 6 were all out in this environment away from each other, 7 presumably you work quite closely together as well? 8 A. Yes. 9 Q. So it was presumably quite a close relationship? 10 A. Yes. 11 Q. Did Mr Morgan ever talk to you about that deterioration 12 generally? 13 A. Yes, the thing is it is quite frustrating for both Paul 14 and Mr Fitzpatrick because they were having to attend 15 these daily meetings between the management and the 16 drivers and the guards and I think actually it was 17 becoming more and more frustrating for them, yes. 18 Q. Is that something that Mr Morgan particularly expressed 19 to you? 20 A. Yes, he would just say he was, pardon my language, he 21 was pissed off. 22 Q. Did Mr Morgan ever tell you he was thinking of leaving? 23 A. No, no. 24 Q. You said a moment ago that your role changed to being 25 effectively one of being pure advisory. Is that a fair</p> <p style="text-align: center;">Page 19</p>
<p>1 Mr Morgan, the guys at Hassi, as to whether or not there 2 was a reduction in the quality of the service you were 3 able to the provide or a reduction in the general 4 quality of the site arising out of those things? 5 A. Yes, effectively we had lost control of the guards at 6 the time and the drivers. The responsibility had been 7 taken away from us. We had principally just been given 8 an advisers role. 9 Q. When you say you had lost control, can you think of 10 particular ways in which that became apparent? 11 A. Day-to-day operations were getting worse. Because of my 12 previous job and previous responsibilities I still tried 13 to carry on having a repertoire and a day-to-day 14 involvement with the guards, asking them to carry out 15 their duties et cetera and making sure gates were 16 getting closed, people were getting checked coming and 17 going out of the camp and more and more that was 18 breaking down and I was effectively just being pushed 19 out to being told not to get involved with them. 20 Q. Is this something that got worse over time from around 21 July 2012 or when particularly are you thinking of when 22 you describe this? 23 A. Yes, I would say it got worse from the handover, yes, 24 definitely. 25 Q. If I understand it correctly Mr Morgan and</p> <p style="text-align: center;">Page 18</p>	<p>1 assessment? 2 A. Yes, yes. 3 Q. It is right, isn't it, though you as the AFMC in your 4 role, you didn't hold any funds, any money to do 5 anything, did you? 6 A. From that capacity -- from July onwards? Not really, 7 no, no. 8 Q. I think one of the things thinking of there, for 9 example, we know that at some point it was recommended, 10 I think by AFMC that T bars, the concrete T bars were 11 placed all around the BdV? 12 A. The BdV, yes, they were already in place. 13 Q. Already in place by the time you were on site? 14 A. Yes. 15 Q. But that wasn't something -- you would simply make the 16 recommendation and the money for that would come from 17 somewhere else, wouldn't it? 18 A. Well, that was above my level. Certainly all the 19 upgrades and that were already in place when I arrived 20 there up in the BdV. 21 Q. Coming then to the Gendarmes. Some questions already in 22 respect of the Gendarmes. Did you feel you got a sense 23 of the -- you knew the Gendarmes well in terms of what 24 they were meant to do and how they did it? 25 A. Yes, I mean, we always had quite a good relationship</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

<p>1 with the Gendarmes. Because at the time sometimes we</p> <p>2 were actually taking an escort from the actual camp to</p> <p>3 the airport and there was, obviously the escort vehicles</p> <p>4 are provided with the Gendarme so you would have an</p> <p>5 interaction with the Gendarmes or sometimes on a daily</p> <p>6 basis the Gendarme vehicles were parked over at VCP1 and</p> <p>7 on VCP2 and you could go over and actually interact with</p> <p>8 them, yes.</p> <p>9 Q. What kind of age were the Gendarmes, the general run of</p> <p>10 them?</p> <p>11 A. I think it varied actually because I think the way</p> <p>12 they're set up some are conscripted and some are actual</p> <p>13 volunteers. I'd say early 20s, maybe up to mid 30s on</p> <p>14 some of them, on the senior people.</p> <p>15 Q. And you say that some of them were conscripted?</p> <p>16 A. I think they were conscripted. I think that's how</p> <p>17 they're set up, yes.</p> <p>18 Q. Did you notice any difference in attitude between those</p> <p>19 who were conscripted and those who were professional or</p> <p>20 indeed did you notice generally a difference in attitude</p> <p>21 between I guess good Gendarmes and bad Gendarmes or were</p> <p>22 they all similar?</p> <p>23 A. No, not really.</p> <p>24 Q. How would you assess their general approach to their</p> <p>25 work then in terms of their attitude?</p> <p style="text-align: center;">Page 21</p>	<p>1 For example, you would see a number of them would be</p> <p>2 expected to be out on patrol, you described 9 or 10</p> <p>3 vehicles. That obviously takes a substantial number of</p> <p>4 them out of that. But it is not just the ones who are</p> <p>5 working at time, as you described the people at the BdV</p> <p>6 would be on rotation and wouldn't necessarily be there</p> <p>7 although there would be a token number potentially</p> <p>8 there. Is it the case that in total from your</p> <p>9 understanding there was 180 Gendarmes though at any one</p> <p>10 time there might have been substantially less than that</p> <p>11 actually active within the detachment?</p> <p>12 A. Possibly, yes.</p> <p>13 Q. Are you able to hazard a guess as to how many Gendarmes</p> <p>14 were there at --</p> <p>15 A. No, no. Even when I attended meetings in the</p> <p>16 Gendarmerie camp you could never ascertain the numbers.</p> <p>17 Q. Turning then to the patrols that were done by the</p> <p>18 Gendarmes. In your witness statement you have actually</p> <p>19 described that they patrolled 10 square metres. It</p> <p>20 seems to me that is obviously an error. It is meant to</p> <p>21 be 10 square kilometres?</p> <p>22 A. Yes, I think it's kilometres, yes.</p> <p>23 Q. That is a fair assessment of the amount of area you</p> <p>24 think they were patrolling?</p> <p>25 A. Mmm.</p> <p style="text-align: center;">Page 23</p>
<p>1 A. From a professional level?</p> <p>2 Q. Yes.</p> <p>3 A. Poor.</p> <p>4 Q. Why do you say that?</p> <p>5 A. Well, you could see the weapons, the weapons are old.</p> <p>6 They don't carry themselves very well. They're</p> <p>7 mismatched dress wise et cetera. But I just put that</p> <p>8 down to that's Algeria.</p> <p>9 Q. How many Gendarmes in total were there at the Gendarme</p> <p>10 camp?</p> <p>11 A. I think it was 180 I think it was.</p> <p>12 Q. Did you ever see that kind of number of Gendarmes in one</p> <p>13 place?</p> <p>14 A. No, no.</p> <p>15 Q. Do you know if while there were 180 there posted did</p> <p>16 they all remain on site even when off shift?</p> <p>17 A. No, no, I think once -- I think they'd work on the same</p> <p>18 basis as they were on a rotation. I don't know how long</p> <p>19 their rotations were, but I've never seen 180 at one</p> <p>20 given time, no.</p> <p>21 Q. Something we have been trying to understand. We have</p> <p>22 heard several times it was around 160. You said 180 or</p> <p>23 so Gendarmes in the Gendarme camp, in total their</p> <p>24 detachment was around that number. Understandably you</p> <p>25 wouldn't ever see the whole lot of them in one place.</p> <p style="text-align: center;">Page 22</p>	<p>1 Q. During the day you described 9 vehicles, during the</p> <p>2 night perhaps five or six. Are you able to say why it</p> <p>3 was that there were fewer vehicles at night?</p> <p>4 A. Well, the vehicles during the day were providing escorts</p> <p>5 for the workers to go out -- to actually go into the</p> <p>6 field. So the vehicles would park up between VCP1 and</p> <p>7 VCP2.</p> <p>8 Q. All nine or ten or would there be some vehicles there</p> <p>9 and --</p> <p>10 A. Sometimes there would be four at one and five at the</p> <p>11 other and it just varied on what the escort requests</p> <p>12 were.</p> <p>13 Q. Did you regard five or six vehicles, however many</p> <p>14 Gendarmes in each, did you regard that as sufficient to</p> <p>15 patrol the area that you understood it to be?</p> <p>16 A. Yes, I think so, yes.</p> <p>17 Q. As we understand it, all the expats were under a curfew</p> <p>18 during effectively the night hours, yes?</p> <p>19 A. That's correct.</p> <p>20 Q. And that included you presumably?</p> <p>21 A. Yes.</p> <p>22 Q. So what knowledge did you have, if any, that the</p> <p>23 Gendarmes were actually out there patrolling at night?</p> <p>24 A. We had a national, I can't remember what his specific</p> <p>25 title was, he was in charge of the drivers and the</p> <p style="text-align: center;">Page 24</p>

<p>1 actual -- he would do patrols between the actual 2 facilities and make sure the guards were okay et cetera 3 up and down between the -- at that time it was the 4 compression camp, the lay down yard and the CPF area and 5 then he would report to us in the morning what he had 6 done and what he had seen. 7 Q. But you yourself never actually saw any Gendarme patrols 8 at night? 9 A. No, no, I was within the camp. 10 MR PERFECT: I am obliged. 11 Questions from MS GERRY 12 MS GERRY: Good afternoon, Mr Lawlor. Have you been in 13 court prior to today? 14 A. Sorry? 15 Q. Have you been in court prior to today or is this your 16 first time in court? 17 A. No, it's my first time. 18 Q. Just to let you know I'm asking questions on behalf of 19 Sebastian John's family. 20 A. Okay. 21 Q. Can I start by asking you about a comment you made in 22 your witness statement which is at page 2. I think you 23 have it in front of you. If you look at the lower 24 holepunch, the paragraph starts: 25 "During this time the expats were basically told to Page 25</p>	<p>1 liaison manager for Hassi Messaoud. 2 A. Yes. 3 Q. So he was the boss of your boss? 4 A. Yes. 5 Q. And we were asking him questions about recommendations 6 that had been made and accepted by the JV in respect to 7 upgrades and improvements to the physical security. In 8 particular, we were looking at the tracking document 9 which, unless you want me to I won't spend time taking 10 you to, but specifically there was mentioned 11 installation of a motorized vehicle sliding gate on all 12 the main entrances and upgrades to perimeter fences. 13 A. Yes, I believe so, yes. 14 Q. Mr Wigg told us yesterday that there was an initial 15 recommendation for improvements to the entrance to the 16 BdV and how it was to be operated. The overall plan 17 wasn't accepted but these individual items were. 18 Do you have any knowledge of what status the 19 implementation was in respect to the motorized vehicle 20 sliding gates? Do you know the order they were 21 received on site? 22 A. No, I don't know about the motorized gates. The only 23 one I was aware of there was supposed to be like 24 a turnstile mechanism and I believe they had arrived and 25 they were sitting in a storage container. Page 27</p>
<p>1 stay at home." 2 Do you see where I'm looking? 3 A. Mmm. 4 Q. So here you are describing what was happening, the 5 strike. The paragraph before: 6 "The strike action lasted for about 6 or 7 months. 7 It ended at the end of November beginning of December. 8 During this time the expats were basically told to stay 9 at home." 10 You then go on to say this: 11 "It also meant that all the maintenance work was 12 carried out by the nationals." 13 A. Mmm. 14 Q. First of all, is it the case that ordinarily the 15 maintenance work would be carried out by expats? 16 A. Normally the positions were supervisory by the expats. 17 Q. By maintenance work I am assuming you are meaning 18 general upgrades and maintenance of the physical site 19 itself; is that right? 20 A. Yes. 21 Q. Was there then during the time of the strike less 22 maintenance work going on as a result of the expats not 23 being on site? 24 A. I believe so, yes. 25 Q. Yesterday we heard evidence from Mr Wigg who was the Page 26</p>	<p>1 Q. Did you have any knowledge of the fact that there were 2 these outstanding items waiting to be put in place? 3 A. Yes, I was aware, yes. 4 Q. Was there any documentation aside from this tracking 5 document that you are aware of in relation to the status 6 of that maintenance work? 7 A. No, I wouldn't have been aware of that. 8 Q. As I understand it, these items were part of a security 9 review of the physical security of the site that was 10 being undertaken and that seems to have been something 11 that was undertaken once the construction side of the 12 site was completed. Is that right? 13 A. Yes. 14 Q. So obviously there was a time when this whole facility 15 was being constructed. When that came towards its end 16 there was then this review: let us see what we need to 17 make this site safe, is that right? 18 A. Yes. 19 Q. In relation to your statement as well you make reference 20 at the bottom of page 2 to saying: 21 "I would say from the information I have received 22 the terrorist have been given inside knowledge." 23 I just want to ask you a little bit about that. 24 First of all, who was the information from, are you able 25 to assist with more detail about that? Page 28</p>

<p>1 A. I can't remember where it came from. Someone had said 2 that they had been asking for, I think it was Mark Cobb 3 at the time, they were wanting to get a hold of him. 4 Now, I can't recollect where the actual -- but they had 5 been calling for names or something I believe. 6 Q. I think there are two aspects to this that you allude to 7 in your statement, one of which, is as you say over the 8 page: 9 "I heard they were asking for Mark Cobb, who is the 10 general manager for BP and Lotfi Benadouda who is the 11 general manager for Sonatrach. I also heard they were 12 asking for Tore Bech." 13 But prior to that you say: 14 "The bus was full of expats leaving at that time to 15 go back to the airport and the canteen was full of 16 people having breakfast." 17 In respect of that piece of possible insider 18 information obviously that relates to the day-to-day 19 timetable, as it were, of the BdV and the CPF and dates 20 on which the bus leaves. 21 That part, first of all, are you able to assist with 22 where that came from, your concern that there might have 23 been inside information provided in relation to that. 24 Do you know where that might have come from? 25 A. No, I can't recollect, sorry.</p> <p style="text-align: center;">Page 29</p>	<p>1 have? 2 A. Certainly the guards -- well possibly more the drivers 3 than your guards. 4 Q. Was it well known within the community at BdV or the CPF 5 that the buses go on set days of the week and go at set 6 times. Was that general knowledge? 7 A. Yes. 8 Q. In terms of specific knowledge it is right, isn't it, 9 that there is a call made to Papa Charlie to say when 10 the bus is leaving site? 11 A. Yes. 12 Q. So the specific time on that morning as to when the bus 13 left would have been communicated to Papa Charlie? 14 A. Yes. 15 Q. You are not able to assist us any further with what 16 insider information you think may have been or who may 17 have suggested it to you? 18 A. No, I'm sorry. 19 Q. Can I just ask you a little bit more about Papa Charlie. 20 We heard yesterday that was a role undertaken by 21 Algerian nationals? 22 A. That's correct. 23 Q. And it was a back-to-back role and it seems there is 24 only a small number of those who undertook that role? 25 A. Yes. There was I think three of them at any given time.</p> <p style="text-align: center;">Page 31</p>
<p>1 Q. Can I just explore with you a little bit though about 2 what that may have entailed. First of all, in terms of 3 the bus convoy there is obviously the dates on which it 4 leaves and they always left on the same days of the 5 week, didn't they? 6 A. Yes. 7 Q. And then obviously there's the time at which the bus 8 convoy leaves to go to the airport? 9 A. Yes. 10 Q. There's two, possibly more theories in relation to the 11 timing of the attack and the bus convoy. One may be 12 wait until the bus has gone because at this point we 13 know the gate is likely to be left open but not a lot of 14 traffic and the Gendarmes supporting it would be 15 off-site. So it would be useful to know when that bus 16 leaves, so we know the gate's open and we can get in. 17 Secondly, there might be a positive intention to 18 actually engage with the bus and to try and take those 19 on the bus hostage. Either of those are possibilities? 20 A. Yes. 21 Q. You just don't know. But obviously that depends on 22 knowing when the bus is going and what time it's going, 23 would you agree? 24 A. Yes. 25 Q. And that is information presumably that the guards would</p> <p style="text-align: center;">Page 30</p>	<p>1 Two for the daytime, one for the night time. 2 Q. And do you know who they were? 3 A. No, not at that time because I'd left. I think it was 4 27 December I left. 5 Q. Is it right that although the radio communications 6 between and from Papa Charlie aren't recorded there is 7 a log that's kept? 8 A. That's correct, yes. 9 Q. Have you seen that log recently? 10 A. I have seen it before, yes. 11 Q. Have you seen the log for this period of time, the 16th 12 and 17th? 13 A. No. 14 Q. Would it be Papa Charlie's role to activate the alarm in 15 the event of being informed of some kind of terrorist 16 threat, incursion, security breach? 17 A. No, the alarms would have been set off from the actual, 18 from the BdV area. Papa Charlie was in the old camp, 19 the companies camp. 20 Q. Are you able to help us with where the alarms are 21 located within the BdV? 22 A. Yes, they're in the -- if you look at C36, where you've 23 got the inner gate and directly, well below that gate 24 the inner gate is marked, is what was my office. 25 Q. Was that the OFC/CCTV building?</p> <p style="text-align: center;">Page 32</p>

8 (Pages 29 to 32)

<p>1 A. Yes, that's correct.</p> <p>2 Q. Is that the only place the alarm could be activated from</p> <p>3 in the BdV?</p> <p>4 A. I can't recollect to be honest with you now. I know</p> <p>5 obviously there was the fire alarm systems attached to</p> <p>6 the actual cabins, but ...</p> <p>7 Q. As far as security alarm your best recollection just in</p> <p>8 your --</p> <p>9 A. I think from the security point of view I think that</p> <p>10 that's where the security alarm was -- would be</p> <p>11 activated from, yes.</p> <p>12 Q. Was there any way of activating it from VCP1 or VCP2?</p> <p>13 A. No.</p> <p>14 Q. Presumably then if the alarm was raised via the radio</p> <p>15 communications, firstly, is it possible that everybody</p> <p>16 who is on -- I think channel 3 was the channel that was</p> <p>17 used for security, is that right?</p> <p>18 A. Yes.</p> <p>19 Q. So if somebody used channel 3 to alert to some kind of</p> <p>20 security threat or incursion could that be picked up by</p> <p>21 anybody who had their radios on and tuning into the</p> <p>22 channel?</p> <p>23 A. Yes, if they were on channel 3, yes.</p> <p>24 Q. And presumably the OLCs or those who were in the OLC</p> <p>25 building, would routinely keep channel 3 open?</p> <p style="text-align: center;">Page 33</p>	<p>1 Q. You said it was a bit of a formality. Can you explain</p> <p>2 what you mean by that?</p> <p>3 A. Because at that time the ASI/SSI, I can't remember what</p> <p>4 they were called, they were then in charge of it, of the</p> <p>5 guard force et cetera.</p> <p>6 Q. Can you give me an example of what you would receive</p> <p>7 from a night time OLC during that time?</p> <p>8 A. I think initially when we were in charge of that</p> <p>9 position you would actually get a small mini report</p> <p>10 telling them where he had been, what he had done and</p> <p>11 timings attached to it.</p> <p>12 Q. And what happened -- how did that change?</p> <p>13 A. When it became the -- the Algerians effectively took</p> <p>14 control.</p> <p>15 Q. In what way did it change?</p> <p>16 A. They didn't have to report to us.</p> <p>17 Q. So in effect you didn't actually get a handover, is that</p> <p>18 the reality of the situation?</p> <p>19 A. Not from them, no.</p> <p>20 Q. So from the time SSI took over there was no handover</p> <p>21 from the night time OLCs to the daytime liaison?</p> <p>22 A. No.</p> <p>23 Q. So you have no idea during this period what was going on</p> <p>24 at night?</p> <p>25 A. No.</p> <p style="text-align: center;">Page 35</p>
<p>1 A. Yes.</p> <p>2 Q. So to the extent that on that morning there was any</p> <p>3 alert put over through channel 3 you would have expected</p> <p>4 Yann I assume to have heard that if he was on site at</p> <p>5 the time?</p> <p>6 A. Yes.</p> <p>7 Q. Did he ever say to you, I know you only had brief</p> <p>8 communication with him but --</p> <p>9 A. No, no.</p> <p>10 Q. In relation to the night time OLCs, so these were</p> <p>11 nationals?</p> <p>12 A. Yes.</p> <p>13 Q. Again, are you able to assist with the names of people</p> <p>14 who fulfilled that role?</p> <p>15 A. At that time, no, I couldn't.</p> <p>16 Q. You mentioned that there were handovers between</p> <p>17 yourselves as the daytime OLCs and the night time OLCs.</p> <p>18 I think you said you get a briefing in the morning from</p> <p>19 the night time OLC, yes?</p> <p>20 A. Yes, at that time that was really a bit of a formality.</p> <p>21 Q. Can I just ask you a couple of things about it. Was</p> <p>22 there a written handover?</p> <p>23 A. No.</p> <p>24 Q. So it was just verbal?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 34</p>	<p>1 Q. You have obviously mentioned that it was very clearly</p> <p>2 stated to you that you couldn't have communication and</p> <p>3 control over the guards and drivers, is that right?</p> <p>4 A. That's correct.</p> <p>5 Q. Can I just ask you to -- you have a green folder in</p> <p>6 front of you there. If you can go to tab 3. You should</p> <p>7 find there a letter dated 12 December from Sonatrach?</p> <p>8 A. Yes.</p> <p>9 Q. I am going to use, if you don't mind the English</p> <p>10 translation which is on page 13, if you turn over. It</p> <p>11 states:</p> <p>12 "The minutes of the district security commissions</p> <p>13 report the involvement of expatriate managers in the</p> <p>14 management of internal security which is contrary to the</p> <p>15 current regulations in force, in particular regarding:</p> <p>16 "- communications with the military authorities,</p> <p>17 "- the management of security measures in place,</p> <p>18 including but not limited to those relating to security</p> <p>19 guards, entry control, electronic surveillance, etc."</p> <p>20 Does that accord with what your experience was in</p> <p>21 terms of -- that you were forbidden from communicating</p> <p>22 with the military authorities and the management and</p> <p>23 security measures as stated there?</p> <p>24 A. I'm not aware of the -- this one for the military</p> <p>25 authorities. Certainly dealing with the guards</p> <p style="text-align: center;">Page 36</p>

<p>1 et cetera, yes.</p> <p>2 Q. Just there in terms of the electronic surveillance, who</p> <p>3 was in charge of monitoring CCTV at this time?</p> <p>4 A. It would be the nationals, the SSI/ASIs.</p> <p>5 Q. And what access did you have to the CCTV system?</p> <p>6 A. Well the actual CCTV room is in the office directly</p> <p>7 opposite my office.</p> <p>8 Q. Were you able to give any directions as to what</p> <p>9 direction the CCTV was pointed in?</p> <p>10 A. Yes, from time to time I went in and asked them, because</p> <p>11 there was a specific camera that pointed to the back of</p> <p>12 the camp and the guard said we can continually reverse</p> <p>13 in the camera to face into the camp.</p> <p>14 Q. Can you be clear about what period of time you are</p> <p>15 talking about here, when was it --</p> <p>16 A. Again, this is from even after July. I was continually</p> <p>17 having to ask them to have the camera pointing rearwards</p> <p>18 to the camp rather than internally because it wasn't</p> <p>19 doing any benefit.</p> <p>20 THE CORONER: Why were they pointing it inwards?</p> <p>21 A. I think they wanted to see their friends going in and</p> <p>22 out of the camp. That's effectively what they were</p> <p>23 doing with it. They were watching the people going in</p> <p>24 and out walking to their accommodation et cetera rather</p> <p>25 than the camera facing the rear of the camp.</p> <p style="text-align: center;">Page 37</p>	<p>1 to the VCP1.</p> <p>2 Q. But in order to zoom in that would be something you</p> <p>3 would do need to do manually?</p> <p>4 A. Yes, to focus.</p> <p>5 Q. Same for VCP2?</p> <p>6 A. No, VCP2 was too far away.</p> <p>7 Q. So there was no camera covering VCP2?</p> <p>8 A. No.</p> <p>9 MS GERRY: Thank you, I have no further questions.</p> <p>10 Questions from MS GOLLOP</p> <p>11 MS GOLLOP: My name is Katie Gollop, I am asking questions</p> <p>12 on behalf of Belinda Green, Stephen Green's wife. Did</p> <p>13 you know Stephen Green?</p> <p>14 A. Yes.</p> <p>15 Q. You worked with him for some time?</p> <p>16 A. Yes, I knew Stephen from when he first arrived and I'd</p> <p>17 actually, just prior to me departing, had been speaking</p> <p>18 to Stephen about transferring to work for Stephen for</p> <p>19 the Compression Project.</p> <p>20 Q. Have you been interviewed by the Algerian authorities</p> <p>21 for information in connection with the attack?</p> <p>22 A. No.</p> <p>23 Q. Do you know at all if the Algerian authorities are</p> <p>24 investigating the attack on In Amenas?</p> <p>25 A. No.</p> <p style="text-align: center;">Page 39</p>
<p>1 THE CORONER: How many people were there in the room</p> <p>2 watching CCTV?</p> <p>3 A. There was one and he rotated. There was just one of</p> <p>4 the -- it was just one of the normal guards and they</p> <p>5 just rotated round different positions.</p> <p>6 MS GERRY: Are you aware of whether or not you could see</p> <p>7 VCP1 from the angles of the CCTV cameras that were in</p> <p>8 place?</p> <p>9 A. Yes, you can see it.</p> <p>10 Q. How clearly?</p> <p>11 A. It's not a great picture but you can see it and make it</p> <p>12 out, yes.</p> <p>13 Q. You can make it out?</p> <p>14 A. Yes.</p> <p>15 Q. What about at night? Would the lighting from the</p> <p>16 perimeter be sufficient to illuminate?</p> <p>17 A. The VCP1 area was well lit with a large orange strobe</p> <p>18 type light so it would tend to dilute the picture on</p> <p>19 CCTV.</p> <p>20 Q. Could you zoom in on VCP1?</p> <p>21 A. Yes, you could zoom in.</p> <p>22 Q. Would you need to manually control the CCTV to move to</p> <p>23 be able to see VCP1 or was there one camera that was</p> <p>24 fixed that would mean that you could always see VCP1?</p> <p>25 A. There was one camera, I'm sure it was a fixed camera, on</p> <p style="text-align: center;">Page 38</p>	<p>1 Q. Have you been interviewed by Statoil for the purposes of</p> <p>2 their investigation report?</p> <p>3 A. No, no.</p> <p>4 Q. Have you ever heard of the quick reaction force said to</p> <p>5 be a unit of the Gendarme?</p> <p>6 A. Yes, QRF, I think it was effectively, that was the night</p> <p>7 time Gendarme who were on call. I think the QRF, they</p> <p>8 were based within the actual compound in the Gendarmerie</p> <p>9 camp. I couldn't, from being on and attending the camp</p> <p>10 with Paul and Anthony Fitzpatrick I think they were</p> <p>11 actually stationed within a small unit, a cabin inside</p> <p>12 of the Gendarmerie camp.</p> <p>13 Q. Ever see them spring quickly into action?</p> <p>14 A. I couldn't recollect, no.</p> <p>15 Q. Another question about the Gendarme. You spoke a moment</p> <p>16 ago in answer to questions from Mr Perfect about seeing</p> <p>17 them occasionally handling weapons and having some</p> <p>18 concerns about that. Can you elaborate a little?</p> <p>19 A. I didn't have any concerns about their weapon handling</p> <p>20 but what I did see was the way they carried themselves,</p> <p>21 the way they carried their weapons, they weren't very</p> <p>22 professional.</p> <p>23 Q. What do you mean by that?</p> <p>24 A. Well, normally going by my own experience you're taught</p> <p>25 to carry a weapon with both hands and be in control of</p> <p style="text-align: center;">Page 40</p>

1 **it at all time. Sometimes they were very lazy and just**
 2 **carried the weapon in one hand et cetera. So it was**
 3 **just a level of professionalism.**
 4 Q. Did you ever see them training, doing any drills,
 5 anything like that?
 6 **A. I seen them sometimes doing drills actually -- we had**
 7 **them on the rig site, they would do drills and seeing**
 8 **them effectively up on the camp also carrying out some**
 9 **drills where they had observation posts round their own**
 10 **camp and you would sometimes see them carrying out**
 11 **a little drill, running out et cetera.**
 12 Q. Are you able to form any view of their proficiency?
 13 **A. Seemed to be fine, yes.**
 14 Q. You started work in In Amenas in 2005; is that right?
 15 **A. Yes.**
 16 Q. Have you ever participated in a security drill, I mean
 17 a security drill rather than a health and safety drill
 18 or fire drill?
 19 **A. Effectively lock the camp?**
 20 Q. Anything like that, yes, for example a lock down drill?
 21 **A. There was once, I wasn't actually on the site at the**
 22 **time. I was actually coming back from the airport and**
 23 **I had overheard on the radio a shut down exercise, in**
 24 **fact it wasn't an exercise, it was a vehicle that had**
 25 **drove through the cordon area without stopping and**

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1 **I believe the Gendarme effectively stopped it. That's**
 2 **the only one I can recollect.**
 3 Q. Any kind of integrated drill involving the Gendarme as
 4 well as people inside the camp?
 5 **A. No, no, I can't recollect one.**
 6 MS GOLLOP: Thank you.
 7 Questions from MR SHARGHY
 8 MR SHARGHY: Mr Lawlor, I ask questions on behalf of the
 9 family of Carlos Estrada. I am going to ask you about
 10 three areas. The first is regarding your claim that the
 11 Algerian government had stated that BAAT, who were the
 12 agency providing drivers, were deemed illegal by the
 13 Algerian government. Can I just ask you where did you
 14 get that information from?
 15 **A. This is just information from talking to the people who**
 16 **were actually on strike.**
 17 Q. Did you carry out any of your own research or speak to
 18 anyone else --
 19 **A. No.**
 20 Q. -- about that?
 21 **A. No, it was nothing to do with me.**
 22 Q. You have been asked questions about the curfew that was
 23 in place. That curfew, as I understand it, was in
 24 relation to expats only?
 25 **A. Yes, yes.**

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1 Q. In other words, nationals, several hundred of them --
 2 **A. They weren't supposed to go out but I know they did go**
 3 **out.**
 4 Q. Yes, that's what I was coming to.
 5 **A. Yes.**
 6 Q. You anticipated the question. They were going out at
 7 night, so from about 5.30 in the evening until whenever
 8 the expats were allowed out, about 5.30 in the morning.
 9 That was the curfew for the expats?
 10 **A. Approximately, yes.**
 11 Q. It would change by an hour depending on sundown?
 12 **A. Yes.**
 13 Q. And given the remote location of the In Amenas plant
 14 they would need a vehicle to go to wherever they were
 15 going, whether they went to town or otherwise?
 16 **A. Yes, the nationals we are talking?**
 17 Q. Yes.
 18 **A. Yes, yes, they would have needed a vehicle, yes.**
 19 Q. And the vehicles on site would be JV vehicles?
 20 **A. Well, sometimes the nationals were parking vehicles up**
 21 **outside of VCP1. They had their own private vehicles**
 22 **parked there.**
 23 Q. But were you aware that they were also taking JV
 24 vehicles?
 25 **A. Not to my recollection, no.**

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1 Q. And we have also heard evidence up to now and no doubt
 2 in due course that the checks by the guards were quite
 3 irregular, especially for the nationals, would you agree
 4 with that?
 5 **A. Yes.**
 6 Q. And that would mean they could take anything out of the
 7 site in the camp and presumably if they are not being
 8 checked as they should be they could bring anything in?
 9 **A. Yes, yes.**
 10 Q. That would include things taken out, thefts et cetera
 11 which you must have been aware of were going on?
 12 **A. Mmm.**
 13 Q. They could take whatever they had taken, stolen out of
 14 the site?
 15 **A. Yes, but sometimes they had actually stopped and they**
 16 **had found contraband in people's bags and some vehicles**
 17 **also so I couldn't actually turn round and say they were**
 18 **all the same. There was ones carrying out their job**
 19 **correctly.**
 20 THE CORONER: Sorry, can I just go back. You said it was
 21 built into the question, I don't know whether you were
 22 agreeing it about thefts of which you were aware they
 23 were going on, is that right? Was there a problem with
 24 stuff being taken out of the camp?
 25 **A. There was an issue that I do remember the drivers were**

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<p>1 taking out tins of soda, like cans of Coca-Cola</p> <p>2 et cetera and the guards were then instructed to stop</p> <p>3 them from taking it out and the guards had also stopped</p> <p>4 a couple of the food vehicles and it had stolen food in</p> <p>5 it as well on a couple of occasions.</p> <p>6 THE CORONER: But so far as individuals were concerned,</p> <p>7 without vehicles, it was what, taking cans of soft</p> <p>8 drinks out?</p> <p>9 A. It was low cost items yes.</p> <p>10 MR SHARGHY: But in terms of bringing items in, contraband</p> <p>11 or otherwise, there could have been weapons brought into</p> <p>12 the site if the checks hadn't been carried out as they</p> <p>13 should have?</p> <p>14 A. If they weren't being carried out correctly, possibly,</p> <p>15 yes.</p> <p>16 Q. Can I now move on to the Gendarmes and I will take this</p> <p>17 in three parts just to simplify it if I can. The first</p> <p>18 part is in relation to the control that there was in</p> <p>19 relation to who the driver was, which vehicle was to be</p> <p>20 provided for the Gendarme patrols. We know that</p> <p>21 around June/July 2012 SSI took over Sonatrach, the</p> <p>22 security team took over, but prior to that whilst the</p> <p>23 drivers and the guards, but I will put that to one side,</p> <p>24 but the drivers were under the control of the JV, it's</p> <p>25 right, isn't it, that records were being kept as to who</p> <p style="text-align: center;">Page 45</p>	<p>1 Q. As far as you are aware from the time you started were</p> <p>2 the records from 2005, 6, 7, 8, all the way up to 2012</p> <p>3 still contained within that shipping container?</p> <p>4 A. I couldn't tell you.</p> <p>5 Q. You may not know this but it is in documentation that</p> <p>6 other witnesses have been taken to, but in December in</p> <p>7 the fourth quarterly audit that the liaison carried out</p> <p>8 it was said that drivers were going to come back under</p> <p>9 the control of the JV?</p> <p>10 A. Yes, I'd heard that, that's correct.</p> <p>11 Q. Are you aware of that?</p> <p>12 A. Yes.</p> <p>13 Q. And that would mean, wouldn't it, that the same</p> <p>14 paperwork in terms of drivers, allocation, dates that</p> <p>15 they were being provided for Gendarme patrol would then</p> <p>16 come into liaison's possession or the JV's possession?</p> <p>17 A. Yes.</p> <p>18 Q. And those would or should be kept up to the date of the</p> <p>19 attack?</p> <p>20 A. Should be, I believe so, yes.</p> <p>21 Q. Can I move on to the second part of the Gendarme issue.</p> <p>22 You weren't here yesterday to hear Mr Fitzpatrick give</p> <p>23 evidence or indeed Mr Wigg give evidence?</p> <p>24 A. No.</p> <p>25 Q. But Mr Fitzpatrick who is an OLS indicated that the</p> <p style="text-align: center;">Page 47</p>
<p>1 the driver was, which vehicle they were assigned to and</p> <p>2 day or night, because the patrols were supposedly</p> <p>3 24 hours a day, when and who was going out to provide</p> <p>4 patrol services to the Gendarmes?</p> <p>5 A. Yes.</p> <p>6 Q. Those would be documents that would be kept where?</p> <p>7 A. Documents were kept in the actual OLCs' office in the</p> <p>8 companies camp. The drivers were supplied via an Ordre</p> <p>9 de Mission and it had the driver's name and the driver's</p> <p>10 vehicle number plate.</p> <p>11 Q. Would it also indicate on that documentation how long</p> <p>12 they were out for and by that I mean out of the BdV or</p> <p>13 their living quarters and where they were going to go</p> <p>14 to, whether it is longitude, latitude or areas?</p> <p>15 A. No, no, it was just time and the mileage that was done,</p> <p>16 used in that time.</p> <p>17 Q. And you were there from 2005 until -- you were about to</p> <p>18 go back to the site on rotation if the attack hadn't</p> <p>19 happened. That is right, isn't it?</p> <p>20 A. Yes, I left in, I think it was May, May of 2012 I left.</p> <p>21 Q. You are keeping these records all the way up</p> <p>22 to July 2012 so it is an ongoing thing. How many years</p> <p>23 would you keep these records for?</p> <p>24 A. Top of my head I couldn't say. They were all kept in an</p> <p>25 ISO container, a shipping container.</p> <p style="text-align: center;">Page 46</p>	<p>1 Gendarmes would go out in the evening for their nightly</p> <p>2 patrols, five vehicles and they'd all go together, so</p> <p>3 they'd all move together. They wouldn't spread out to</p> <p>4 cover the area they were patrolling, almost like ducks</p> <p>5 in a row they'd follow each other out into wherever they</p> <p>6 were going to patrol. Was that your understanding of</p> <p>7 the method by which the Gendarmes were patrolling at</p> <p>8 night?</p> <p>9 A. I think it was. On a couple of occasions I had seen</p> <p>10 them driving at night and it was, as you said, ducks in</p> <p>11 a line, yes.</p> <p>12 Q. And Mr Fitzpatrick also said that the reason they did</p> <p>13 that was because it was safer. You wouldn't, I think</p> <p>14 his words were to the tune of: you wouldn't let just one</p> <p>15 cargo out into the vast desert on its own. Would you</p> <p>16 agree with that?</p> <p>17 A. Yes, it's possible for the Gendarme to maintain control</p> <p>18 of their vehicles, yes.</p> <p>19 Q. And on that one or so occasion when you saw the</p> <p>20 Gendarmes in the evening going out they had their lights</p> <p>21 on, didn't they?</p> <p>22 A. Yes.</p> <p>23 Q. It is dark, they need to see where they're going. Now,</p> <p>24 can I work through, and this is the third part,</p> <p>25 a scenario with you, which is not too far removed from</p> <p style="text-align: center;">Page 48</p>

<p>1 what in fact happened.</p> <p>2 Would you agree that the risk which was prevalent</p> <p>3 insofar as liaison security on site was concerned was</p> <p>4 the risk of unauthorised access into the BdV or any</p> <p>5 other part of the site by terrorists?</p> <p>6 A. Sorry, can you repeat the question?</p> <p>7 Q. Yes, of course. The main risk that was to be guarded</p> <p>8 against, and we have seen again documents, risk</p> <p>9 assessments, et cetera from BP and the liaison, was to</p> <p>10 do with terrorist attacks. Whether, for example,</p> <p>11 they're vehicle borne IEDs or they are forced entries,</p> <p>12 armed men in vehicles trying to come through. You would</p> <p>13 agree with that?</p> <p>14 A. Yes.</p> <p>15 Q. So if there was a single terrorist vehicle in the desert</p> <p>16 and around the site in order to evade the patrolling if</p> <p>17 they were patrolling Gendarmes would be to simply look</p> <p>18 for their lights if they were visible in the distance</p> <p>19 and position themselves where they couldn't be seen or</p> <p>20 found?</p> <p>21 A. Yes.</p> <p>22 Q. And the single vehicle could contain four to six, let's</p> <p>23 say terrorists with weapons and weapons that would</p> <p>24 include guns, mortar rounds, RPGs, bombs, hand grenades</p> <p>25 et cetera, having evaded the patrolling Gendarmes could</p> <p style="text-align: center;">Page 49</p>	<p>1 A. They would have had to have cut through another fence.</p> <p>2 Q. But we know they have got cutting facilities so they</p> <p>3 have got through the fence?</p> <p>4 A. Okay.</p> <p>5 Q. And they're in. There is no possibility of the unarmed</p> <p>6 guards challenging them, is there?</p> <p>7 A. No.</p> <p>8 Q. There are no Gendarmes or any other armed personnel on</p> <p>9 site who could challenge them?</p> <p>10 A. No.</p> <p>11 Q. There is nothing stopping them from setting booby traps,</p> <p>12 taking hostages or indeed randomly killing people, is</p> <p>13 there?</p> <p>14 A. No.</p> <p>15 Q. That's one way. Let us look at a second way. They wait</p> <p>16 until around about 5.30. The gates are opened, the</p> <p>17 outside gate and the barrier is lifted. The bus comes</p> <p>18 out. Vehicles may be coming out as well. And they</p> <p>19 could just drive straight in at speed shooting out in</p> <p>20 front of them?</p> <p>21 A. Yes.</p> <p>22 Q. Just wait, Mr Lawlor. Have you seen this photo before?</p> <p>23 A. No.</p> <p>24 Q. I hope you agree this is the entrance leading into the</p> <p>25 BdV?</p> <p style="text-align: center;">Page 51</p>
<p>1 do one of two things or indeed both of them. The first</p> <p>2 is they could drive quickly up to a part of the fencing</p> <p>3 and you should have the photo in front of you on the</p> <p>4 screen. Can you see on the very right-hand side you</p> <p>5 have guard tower written in green, the top guard tower</p> <p>6 and the sticker?</p> <p>7 A. Yes.</p> <p>8 Q. So round about there, not in full view of the guardhouse</p> <p>9 but further round the corner they could go there, cut</p> <p>10 a hole in the fence and get in?</p> <p>11 A. If they arrive in a vehicle from there depending on what</p> <p>12 their approach was they would either be seen by the</p> <p>13 guards at the JGC camp hopefully or the guards at the</p> <p>14 VCPI.</p> <p>15 Q. I will come on to that but that is a way that they could</p> <p>16 get into the BdV, cut through the fence and go in?</p> <p>17 A. Yes, but there's a back end to it an enclosed area.</p> <p>18 That's just an external fence. There's an internal</p> <p>19 fence from that one.</p> <p>20 Q. If they cut through both fences and get in?</p> <p>21 A. Okay, that's them now in the car park.</p> <p>22 Q. And given that they may have some inside knowledge as to</p> <p>23 where the canteen is for example or where the VIP area</p> <p>24 is they could head straight for there and take hostages,</p> <p>25 couldn't they?</p> <p style="text-align: center;">Page 50</p>	<p>1 A. Yes.</p> <p>2 Q. You have the chicanes, the outer gate and there is the</p> <p>3 inner gate where roughly you see the bus parked in the</p> <p>4 distance?</p> <p>5 A. Mmm.</p> <p>6 Q. That is what the terrorists did on the 16th. A vehicle,</p> <p>7 and there are photos of that vehicle, ramming that</p> <p>8 chicane, perhaps, maybe there is a car coming, trying to</p> <p>9 avoid it but going straight in. If they do that at</p> <p>10 speed with guns no one is going to challenge them, are</p> <p>11 they?</p> <p>12 A. No.</p> <p>13 Q. Again, working through the process, they are in, they</p> <p>14 can take hostages, they can set booby traps, they can</p> <p>15 take positions to defend what they have taken?</p> <p>16 A. Yes.</p> <p>17 Q. Assume, if you will, let us give the system the benefit</p> <p>18 of the doubt, that the alarm goes off. The CCTV</p> <p>19 operator has a look or the motion sensor, sets off the</p> <p>20 notification and the alarm goes off. That alarm won't</p> <p>21 necessarily inform the Gendarmes as to where the attack</p> <p>22 is. That would come by way of radio or mobile</p> <p>23 communication, wouldn't it, to the Gendarmes?</p> <p>24 A. It would be the radio operator.</p> <p>25 Q. But the radio operator is based where?</p> <p style="text-align: center;">Page 52</p>

13 (Pages 49 to 52)

<p>1 A. In the companies camp or -- within the -- let me see.</p> <p>2 If you look at your C36.</p> <p>3 Q. Shall we go back to the map that we had a few moments</p> <p>4 ago?</p> <p>5 A. Okay.</p> <p>6 Q. C36. The companies camp is top left, isn't it?</p> <p>7 A. The companies camp is front left.</p> <p>8 Q. Top of the photo on the left-hand side?</p> <p>9 A. Yes, where you have got the gates with a number 2 next</p> <p>10 to it and 50 Man office.</p> <p>11 Q. Yes.</p> <p>12 A. Right. Directly opposite it is the building, it's not</p> <p>13 the two narrow grey buildings, that is our car park area</p> <p>14 but the building in front of that is where the radio</p> <p>15 operator was based.</p> <p>16 Q. So the radio operator having heard an alarm would have</p> <p>17 to look out and see what's going on and then radio?</p> <p>18 A. Well, he wouldn't be able to see from over there.</p> <p>19 Q. So how would he or she be able to tell the Gendarmes</p> <p>20 where the incident is in the BdV?</p> <p>21 A. The only way he could do it is if somebody has informed</p> <p>22 him by radio.</p> <p>23 Q. So that will take minutes or so?</p> <p>24 A. Well --</p> <p>25 Q. By which time the terrorists are already in?</p> <p style="text-align: center;">Page 53</p>	<p>1 Gendarmes at the gate to fight off --</p> <p>2 A. Mmm.</p> <p>3 Q. -- the incursion, isn't it?</p> <p>4 A. Yes, but there was a small camp that the Gendarmes lived</p> <p>5 on during the construction phase but then they moved out</p> <p>6 over to their own camp.</p> <p>7 Q. And they also manned the guard towers as well. But that</p> <p>8 was the military, wasn't it, rather than the Gendarmes?</p> <p>9 A. Well, the Gendarmes never manned the guard towers around</p> <p>10 the camp.</p> <p>11 Q. That would be the only way to effectively guard against</p> <p>12 an armed incursion?</p> <p>13 A. Yes.</p> <p>14 MR SHARGHY: Thank you.</p> <p>15 Questions from MR POPAT</p> <p>16 MR POPAT: Mr Lawlor, I ask questions on behalf of BP. May</p> <p>17 I just through you correct something that was put to</p> <p>18 you. I think it was just suggested to you that</p> <p>19 Mr Fitzpatrick gave evidence yesterday in which he said</p> <p>20 that patrols involved cars that were effectively ducks</p> <p>21 in a row. I am sorry this isn't actually a question for</p> <p>22 you but just so that it is on the record. In fact</p> <p>23 Mr Fitzpatrick corrected that evidence a little later on</p> <p>24 and said no, he couldn't say that. That was an error on</p> <p>25 his part. It wouldn't be something that he would be</p> <p style="text-align: center;">Page 55</p>
<p>1 A. It depends who's seen the terrorists coming in first.</p> <p>2 Q. Well, the people -- if it's coming through the first</p> <p>3 gate it would be the guards?</p> <p>4 A. Mmm.</p> <p>5 Q. But they can't raise the alarm, can they?</p> <p>6 A. No.</p> <p>7 Q. Nor can they communicate with the Gendarmes?</p> <p>8 A. Well, if -- the guy's seen it within the CCTV because</p> <p>9 there is a fixed camera on to the inner gate on the</p> <p>10 living area, if he's seen that he can activate it.</p> <p>11 THE CORONER: There are quite a lot of "depends" about all</p> <p>12 of this really, aren't there?</p> <p>13 A. Yes.</p> <p>14 MR SHARGHY: But for the quick reaction force to deploy they</p> <p>15 would need to know that there is an incident and where</p> <p>16 it is?</p> <p>17 A. Yes.</p> <p>18 Q. But in any given scenario, as we have discussed, they</p> <p>19 would be too late attending the scene?</p> <p>20 A. Yes.</p> <p>21 Q. And this camp, the BdV, was not constructed to withstand</p> <p>22 a forced entry by terrorists, was it?</p> <p>23 A. I don't believe so, no.</p> <p>24 Q. So the only way that you could effectively guard against</p> <p>25 that risk of forced attack would be to have armed</p> <p style="text-align: center;">Page 54</p>	<p>1 aware of. But you have given your evidence about the</p> <p>2 occasion you saw about the patrols.</p> <p>3 A. Yes.</p> <p>4 Q. Thank you for that. Just in relation to one other point</p> <p>5 that was being discussed with you. I am not sure</p> <p>6 I understood which point was being identified around the</p> <p>7 perimeter of the camp but it is right that apart from</p> <p>8 where the gates are, which we can see, a vehicle trying</p> <p>9 to get into and beyond the fences into the camp would</p> <p>10 have to get through the T bars?</p> <p>11 A. Yes.</p> <p>12 Q. Can I just ask you a few questions about your role as an</p> <p>13 OLC at the time.</p> <p>14 A. Mmm.</p> <p>15 Q. Are you still employed as an OLC?</p> <p>16 A. No, no.</p> <p>17 Q. You were based in the office we can see on this</p> <p>18 diagram/plan C36. It is the building which has a faint</p> <p>19 arrow drawn to it saying "OLC/CCTV building"?</p> <p>20 A. Yes.</p> <p>21 Q. Is that where you would be based at all times when you</p> <p>22 were on duty?</p> <p>23 A. Yes.</p> <p>24 Q. You would have a view out of that building?</p> <p>25 A. There's a rear view towards the recreation room and the</p> <p style="text-align: center;">Page 56</p>

<p>1 cooking area.</p> <p>2 Q. And would you come out of your office, out of that</p> <p>3 building to check on the gates and the guards --</p> <p>4 A. Yes.</p> <p>5 Q. -- and the guardhouse and how they were operating?</p> <p>6 A. Yes.</p> <p>7 Q. One of your main functions, is it right, was to monitor</p> <p>8 the guards and how they carried out their access control</p> <p>9 duties?</p> <p>10 A. Yes.</p> <p>11 Q. Is that right?</p> <p>12 A. Yes.</p> <p>13 Q. Throughout the time you were in post you were aware that</p> <p>14 the guards were trained and instructed to ensure that</p> <p>15 gates were shut?</p> <p>16 A. Mmm.</p> <p>17 Q. Is that right?</p> <p>18 A. Yes.</p> <p>19 Q. That bags should be checked?</p> <p>20 A. Mmm.</p> <p>21 Q. That passes and requisite paperwork should be checked to</p> <p>22 ensure that people getting access into the camp were</p> <p>23 people who were appropriately authorised to gain access?</p> <p>24 A. Yes.</p> <p>25 Q. And that was the position all throughout the time up to</p> <p style="text-align: center;">Page 57</p>	<p>1 A. Yes.</p> <p>2 Q. And the guards who were in place were the same guards</p> <p>3 who had been trained by the liaison team</p> <p>4 before July 2012?</p> <p>5 A. Yes.</p> <p>6 Q. There were no new people?</p> <p>7 A. No -- maybe one or two individuals, that is about it.</p> <p>8 Q. And you would still monitor to make sure that they were</p> <p>9 closing gates, checking bags, checking passes and so on?</p> <p>10 A. Mmm.</p> <p>11 Q. But the difference post July 2012 was you were certainly</p> <p>12 over a period of time less able to simply go up to the</p> <p>13 guards and say "Hold on, you've got to do this better"</p> <p>14 or "You've done something wrong and can you make sure</p> <p>15 you correct it"?</p> <p>16 A. Yes, we weren't allowed to have any interaction with</p> <p>17 them.</p> <p>18 Q. I said you wouldn't normally do that because an answer</p> <p>19 you gave earlier on in your evidence suggested that you</p> <p>20 still did speak to the guards and say "look, sort this</p> <p>21 out", for example, the CCTV cameras were operated by</p> <p>22 guards and notwithstanding the instruction to you not to</p> <p>23 go and speak to the guards directly you still obviously</p> <p>24 did do so?</p> <p>25 A. Yes, still did it.</p> <p style="text-align: center;">Page 59</p>
<p>1 and including the time in about July 2012 when</p> <p>2 management for the guards was handed over to SSI?</p> <p>3 A. Yes.</p> <p>4 Q. Is that what you would do? You would monitor the guards</p> <p>5 to check that they were, insofar as you obviously could,</p> <p>6 doing their job properly?</p> <p>7 A. Yes.</p> <p>8 Q. But would it be the case that on occasions in those</p> <p>9 years preceding 2012 the guards didn't always do their</p> <p>10 job properly?</p> <p>11 A. I think in the time, the periods that I was there, and I</p> <p>12 only answer for myself, that if you've seen them and</p> <p>13 they weren't carrying out their duties effectively you</p> <p>14 could actually go and deal with it there and then.</p> <p>15 Q. I understand that and that's one of the changes that</p> <p>16 occurred in 2012.</p> <p>17 A. Yes.</p> <p>18 Q. But you were monitoring the guards and implicit in your</p> <p>19 answer just now on occasions at least they didn't do</p> <p>20 their job properly but you would go over and say to them</p> <p>21 "sort that out"?</p> <p>22 A. Yes.</p> <p>23 Q. After 2012 or July 2012 you carried on your monitoring</p> <p>24 role, monitoring the guards to see if they were doing</p> <p>25 their job properly?</p> <p style="text-align: center;">Page 58</p>	<p>1 Q. But if anything caused you concern you were in</p> <p>2 a position to and would identify that to your superiors?</p> <p>3 A. Yes.</p> <p>4 Q. And you would also be able to communicate with the ASI?</p> <p>5 A. Yes.</p> <p>6 Q. And would be expected to tell the ASI and your superiors</p> <p>7 if, for example, the guards weren't doing their job</p> <p>8 properly?</p> <p>9 A. Yes.</p> <p>10 Q. Over that time from July 2012, and I do understand that</p> <p>11 you weren't responsible directly for the guards from</p> <p>12 that time, but is it right to say that you saw</p> <p>13 occasions, perhaps more occasions than you had</p> <p>14 before July 2012, of the guards not doing their job</p> <p>15 perfectly or as properly as they should be doing them?</p> <p>16 A. Yes.</p> <p>17 Q. And you did identify that to your superiors and to the</p> <p>18 ASI?</p> <p>19 A. That's correct.</p> <p>20 Q. Look very briefly if you would, with me, at one</p> <p>21 document. It is in that green bundle. It is behind</p> <p>22 divider 5. To see if you agree from your perspective</p> <p>23 with what's contained in this document. This is an</p> <p>24 internal security review, overview, which was prepared,</p> <p>25 we have heard, by the liaison managers at</p> <p style="text-align: center;">Page 60</p>

<p>1 Hassi Messaoud. I don't know if you have seen this 2 document before or would be expected to have seen it. 3 A. No. 4 Q. You see at the bottom of that first page under the 5 heading "SSI" somebody has summarised the position in 6 this way and I just want to see if this accords with 7 your assessment being on the ground, so to speak, 8 monitoring the guards as you were: 9 "The guards' internal security is now owned and 10 operated by the [Sonatrach] ASIs. Since the inception 11 of this change there have been a number of events which 12 have highlighted associated bedding in problems." 13 Do you agree with that? 14 A. Yes. 15 Q. "The military have complained twice about the drop in 16 levels of access control to the field and sites and 17 during the recent strikes civilians were allowed access 18 to the BdV despite clear instructions to stop them. 19 Indeed liaison management were not even informed of 20 their presence." 21 Were you aware of that? 22 A. I was aware of one incident, yes. 23 Q. Then there is reference to the industrial action and if 24 you look just at the last sentence on that page: 25 "That said irrespective of the contributory factors Page 61</p>	<p>1 Q. This is the view that was communicated in the security 2 review. Did you communicate any different view to your 3 superiors or to the ASI? 4 A. No, just the incidents I noticed with the gates not 5 being closed et cetera. 6 Q. If the situation had worsened or it was creating a real 7 threat to security and the safety of people on site you 8 would have taken action to at least report matters 9 further up? 10 A. Yes. 11 Q. Or indeed possibly take other action to speak to the 12 guards yourself in the way you did in relation to the 13 CCTV -- 14 A. I would try to. 15 Q. -- operators. Can I just ask you about a different 16 topic and that relates to the alarm drill. I think you 17 did say in your answer when you were asked about this 18 again that there was an occasion when the security alarm 19 was sounded and people were required to lock down? 20 A. Yes. 21 Q. Did I understand you correctly to say that that was an 22 occasion when, as you understood it, not being present 23 yourself, but hearing things over the radio, that an 24 incident had occurred where a vehicle had gone through 25 a cordoned area and the Gendarmes had effectively Page 63</p>
<p>1 the project cannot sustain poor access control and the 2 levels of SSI performance should be closely monitored 3 and corrective action taken if required." 4 A. Yes. 5 Q. That is in part what you were there to do? 6 A. Yes. 7 Q. Over the page, please. Reference to: 8 "Allowing the ASIs to concentrate on their core 9 roles, and so drivers are now managed by the expat 10 liaison team." 11 And then if you go down to the next paragraph: 12 "Ultimately, there is no reason that SSI cannot 13 attain acceptable levels of access control and security. 14 The recent strikes have tested the SSI before it really 15 had a chance to bed in completely and it is expected 16 that the strong relationships, understanding and 17 cooperation at site will lead to deeper integration and 18 increased SSI performance in the future." 19 Does that accord with your view? 20 A. I don't think it was ever going to work to be honest 21 with you. 22 Q. You felt that not having that ability to manage the 23 guards directly would always create the difficulty you 24 have explained? 25 A. Yes. Page 62</p>	<p>1 activated the alarms and the lock down procedure? 2 A. I can't -- as I say, I wasn't on site at the time. All 3 I heard was on the radio. Someone had called out a code 4 blue and that effectively tells everyone to lock the 5 gates and then the next I heard, later on I heard, again 6 this is radio chatter, that the Gendarmes have stopped 7 a vehicle. I don't know whereabouts it was or anything 8 like that. 9 Q. A different topic, a short point. You were asked about 10 there being potentially less maintenance carried out of 11 the physical features on site because of the strike and 12 you said you thought there probably was less maintenance 13 during the strike. I just wanted to understand why that 14 would be the case. The maintenance was being carried 15 out by nationals but those who weren't guards or 16 drivers, they were people employed by the JV. They 17 weren't on strike, were they? 18 A. No, but the supervisors, because there are reduced 19 levels of expats the supervisory levels were reduced. 20 Q. I see, so they weren't able to be supervised as much or 21 as well as they had been previously so that might have 22 had a consequential effect? 23 A. Yes. 24 Q. Thank you. The night time OLC. You explained how he 25 had reported to you and the sort of level of detail in Page 64</p>

<p>1 the information provided to you in the mornings. After 2 the transfer the level of information provided to you 3 was much less and more a case of saying -- 4 A. Well it was -- 5 Q. -- everything was all right -- 6 A. It stopped. 7 Q. -- or I carried out the patrols. 8 Did he report to the ASI as required, do you know? 9 A. I can't remember -- it's a long time ago. I'm sure his 10 structure was he reported to the SSI I think who was the 11 overall in charge of them all. 12 Q. We have seen lots of documents and we have some 13 familiarity with the titles and I think it was called 14 the ASI? 15 A. I can't remember if it was the ASI and then it went into 16 the SSI or whoever. 17 Q. But that person, whoever it was he was supposed to be 18 reporting to, were you aware of him reporting to that 19 person -- 20 A. No. 21 Q. -- to say -- you weren't aware either way? 22 A. No. 23 Q. Thank you. And finally, just this: you said, and you 24 said this in your statement I think, that you think that 25 the Gendarme may have been people who weren't</p> <p style="text-align: center;">Page 65</p>	<p>1 not entirely sure what the status is of the request that 2 had been made for a list of all those who were 3 interviewed by Statoil and if there was to be an 4 objection which was to be upheld in relation to the 5 disclosure of that list by Statoil, then there shouldn't 6 be a sort of back door route to getting that same 7 information or at least some of that information through 8 BP. 9 But in answer to your overall point, BP is content 10 to provide such a list as it can. 11 THE CORONER: Well, Mr Laidlaw, there can't be any 12 difficulty about it, the reason Mr Ferguson gave was 13 something about employees of Statoil might have some 14 difficulty or it might undermine their relationship with 15 Statoil but it is not going to apply to BP employees is 16 it? 17 MR LAIDLAW: I simply don't know. I'm not really in 18 a position to indicate I don't think about the position 19 in respect of BP. 20 THE CORONER: Very well. So he's not objecting so can 21 I have your list. 22 MR POPAT: Certainly we will put together such a list as we 23 can. 24 THE CORONER: All right, we will do that. I anybody else 25 has got -- we can just get at it another way. We may be</p> <p style="text-align: center;">Page 67</p>
<p>1 professional soldiers, they may have been conscripted. 2 You don't know that? 3 A. I don't know that for a fact, no. I'm just -- from what 4 some people had told me, yes. 5 MR POPAT: Thank you, Mr Lawlor. 6 THE CORONER: Thank you very much indeed. 7 A. Okay, thank you. 8 (The witness withdrew) 9 THE CORONER: We will just have a ten-minute break. 10 (3.34 pm) 11 (A short break) 12 (3.55 pm) 13 THE CORONER: Mr Popat, I have had a brief look at some of 14 the submissions. I think in yours there is an 15 indication that you are prepared, if I ask for it, to 16 give me a list of your employees because I think part of 17 the worry that, as I understood it, from Statoil was 18 that employees might have a problem. I can't remember 19 quite how it was developed but it is not going to apply 20 to your employees. Have I got it right? You have 21 a list and you are prepared to give that? 22 MR POPAT: Sir, we don't have a list as such but one could 23 be created in relation to those employees that we know 24 about. We can't say that would be the complete list. 25 It is not an issue but the point we raised was we are</p> <p style="text-align: center;">Page 66</p>	<p>1 able to -- I do regard a lot of this as rather 2 unnecessary. That is not directed at you. So if we can 3 have your list we would be very grateful. 4 MR POPAT: We will get it to you as soon as possible. 5 THE CORONER: Yes, thank you. 6 MS DOLAN: The next witness is Mr Jones. 7 MR ROBERT JONES (affirmed) 8 Questions from MS DOLAN 9 MS DOLAN: Good afternoon, Mr Jones, I think you know I'm 10 Bridget Dolan and I ask questions on behalf of the 11 coroner. 12 A. Good afternoon. 13 Q. Can you give us your full name? 14 A. Robert Alan Jones. 15 Q. And I think at the time of the events we are concerned 16 you were, working at In Amenas gas plant? 17 A. Yes, I was. 18 Q. What capacity were you working in? 19 A. I was the emergency response adviser. 20 Q. What does that mean to us? 21 A. I was responsible for emergency planning and the 22 response to it in terms of fire explosion, gas leaks, 23 emergency plans and training people there, the emergency 24 teams, the fire team that was on site and also the IMT 25 for engine drills and training them against the plans.</p> <p style="text-align: center;">Page 68</p>

<p>1 Q. What was your background before you came to In Amenas? 2 A. I spent 24 years in the military followed by three years 3 in emergency response training for the oil and gas 4 industry. 5 Q. When you were in the military what experience did you 6 have of small arms fire or munitions and the sounds of 7 them being deployed? 8 A. Lots. 9 Q. How long had you worked at In Amenas by the 10 time January 2013 came round? 11 A. Just short of four years. 12 Q. In January 2013 when did your rotation begin? 13 A. It had -- 14 Q. It is not a memory test. I have it in front of me. 15 A. Literally roughly a week before the attack. 16 Q. I have 9 January 2013 in your witness statement. Would 17 that be about right? 18 A. Yes. 19 Q. And I think your back-to-back was Gary Rose? 20 A. He was, yes. 21 Q. And on this occasion you overlapped with him? 22 A. I did, yes. 23 Q. Why was that? 24 A. We were planning a major exercise that was to involve 25 shareholders, so normally they just stayed within the</p> <p style="text-align: center;">Page 69</p>	<p>1 Q. And how many people were aware of what the nature of the 2 incident was? 3 A. Many. There were lots. Basically because of the 4 logistics we had to arrange support from drivers, 5 casualties, we had multiple casualties, safety men, 6 standby people, observers, so there was a lot of people 7 involved. 8 Q. And you say your requirement was to do this annually. 9 When had it last been done? 10 A. We were overdue, again, because of the strikes and the 11 other problems that had been ongoing for 18 months so it 12 would have been almost two years ago I believe, I wasn't 13 involved in the one previously. 14 Q. I think that training exercise or drill didn't actually 15 happen. Why was that? 16 A. It was cancelled because on the day of the exercise, 17 I believe it was the day or the day before, the drivers 18 called another strike. We needed the drivers to 19 actually move the people as part of the logistics to set 20 it up. They called an impromptu strike and we had been 21 informed that morning by the ops manager that they had 22 to cancel due to the strike. 23 Q. Setting aside that major exercise were you involved in 24 arranging any other drills or training at a minor level? 25 A. Yes, normally once a month we would have an exercise of</p> <p style="text-align: center;">Page 71</p>
<p>1 bounds of the facility or maybe up to the IMT at 2 Hassi Messaoud. We had a remit annually to do a major 3 one that actually went up to shareholder level so it 4 would actually go back to the shareholders UK, Norway 5 the Algerians and so on. 6 Q. By shareholders you mean the three parent companies of 7 the JV? 8 A. That's correct, yes. 9 Q. And the exercise you were going to arrange was what, to 10 be witnessed by them or? 11 A. No, they would actually partake because as we pushed the 12 levels of response up they would be required to actually 13 respond and put some input in from their location, their 14 business support teams back in there. 15 Q. So at Hassi the business support team would have to do 16 something to respond? 17 A. They would then escalate it up to the next level. 18 Q. So this was like a drill but a drill that went all the 19 way to senior level? 20 A. Correct. 21 Q. What was that training exercise going to comprise of in 22 terms of? 23 A. It was going to be a major road traffic incident 24 involving a bus and several other vehicles on the 25 extremities of the base.</p> <p style="text-align: center;">Page 70</p>	<p>1 some sort, usually involving what was known as the FIMT, 2 the Field Incident Management Team. 3 Q. So that was the people in your part of the organisation? 4 A. No, they would normally come under the -- the ops 5 manager would be the incident manager in an event of 6 that team. The team I worked with normally on 7 a day-to-day basis was what we called the intervention 8 team, effectively the fire service for the unit. 9 Q. And when you did the smaller drills would that involve 10 all the personnel in the camp having to respond to 11 alarms or something like that or was it just testing out 12 the capabilities of the IMT? 13 A. No, we'd do what we would call integrated drills. If we 14 did a full integrated drill that would involve everyone 15 because it would usually involve a muster, physically 16 deploying the fire teams to the incident. We would have 17 casualties, it would go as far as actually, you know, 18 picking them up, treating them in ambulances or triage, 19 taking them back to a clinic. The FIMT would be 20 involved for incident management training and 21 occasionally that would be pushed up as far as 22 Hassi Messaoud as well. 23 Q. You said a monthly one. Would that involve simulated 24 casualties and ambulances? 25 A. Yes.</p> <p style="text-align: center;">Page 72</p>

<p>1 Q. And that would happen every month?</p> <p>2 A. Normally, yes.</p> <p>3 Q. And we have heard some of the people who worked at the</p> <p>4 plant say that they recall muster drills?</p> <p>5 A. Yes.</p> <p>6 Q. Would the muster drill be something that was happening</p> <p>7 at the same time as that incident?</p> <p>8 A. Yes, it would.</p> <p>9 Q. Did the drills ever involve security -- as opposed to</p> <p>10 health and safety incidents if I can separate them in</p> <p>11 that way?</p> <p>12 A. Yes, I can recall we did one security drill, yes.</p> <p>13 Q. One in the time that you were there?</p> <p>14 A. Yes.</p> <p>15 Q. Do you have any explanation for why security was only</p> <p>16 done once whereas the health and safety drills were done</p> <p>17 monthly?</p> <p>18 A. Health and safety, in terms of the muster drills I guess</p> <p>19 was deemed to be the more credible scenario. There was</p> <p>20 more chance of fire, explosion, gas leaks, things like</p> <p>21 that than there was of, you know, a terrorist attack.</p> <p>22 Q. I want to move now to the day of the incident.</p> <p>23 A. Yes.</p> <p>24 Q. First of all, where do you live when you are at the</p> <p>25 facility?</p> <p style="text-align: center;">Page 73</p>	<p>1 the medic and the duty fire team would live in there.</p> <p>2 Q. And we can see although there has been lines put into</p> <p>3 this -- it appears the perimeter fence is to the right</p> <p>4 of that building?</p> <p>5 A. Correct.</p> <p>6 Q. What is the distance approximately between the building</p> <p>7 and the perimeter fence?</p> <p>8 A. About 20 metres. Out the back it is quite close.</p> <p>9 Q. And so on the morning of the 16th what was the first</p> <p>10 point at which you realised this wasn't a usual morning?</p> <p>11 A. It was 5.50 in the morning. The alarms went off in the</p> <p>12 building, the fire alarms. It was in fact the general</p> <p>13 alarm. They used the same system. So if the general</p> <p>14 alarm goes the fire alarms go off simultaneously on all</p> <p>15 buildings. So the fire alarms went off and that was at</p> <p>16 the same time as a total black out, so all the lights</p> <p>17 went out. There was no power. Inside or outside or any</p> <p>18 of the buildings, it was a total black out.</p> <p>19 Q. When you say the fire alarm went off. We have heard</p> <p>20 about two different alarms. A constant alarm for fire</p> <p>21 and an intermittent one for security. What went off?</p> <p>22 A. Okay, there is no security alarm within the CPF or the</p> <p>23 IBO. There is just the general alarm and the fire</p> <p>24 alarms.</p> <p>25 Q. And is there any difference in the signal of the general</p> <p style="text-align: center;">Page 75</p>
<p>1 A. I'm in a unique position. I was one of only two expats</p> <p>2 that actually live on the IBO as opposed to the BdV. So</p> <p>3 I don't live within the living area.</p> <p>4 Q. So you live at the CPF/IBO area?</p> <p>5 A. Correct, yes.</p> <p>6 Q. And who is the other expat who lives there?</p> <p>7 A. The medic.</p> <p>8 Q. And who's that?</p> <p>9 A. At the time it was Murielle Ravey.</p> <p>10 Q. So on the morning of the 16th then we take it you are at</p> <p>11 the IBO?</p> <p>12 A. IBO, yes.</p> <p>13 Q. And where is your accommodation in relation to the IBO</p> <p>14 building itself?</p> <p>15 A. It's within the HSE building which is opposite the fire</p> <p>16 station.</p> <p>17 Q. Is it helpful to perhaps at this stage look on the map</p> <p>18 of the CPF which is C41. We have a marking there saying</p> <p>19 "HSE building". First of all, is the marking in the</p> <p>20 right place?</p> <p>21 A. Yes, that's the one.</p> <p>22 Q. And that's?</p> <p>23 A. My office was based there so the north end of the</p> <p>24 building is office accommodation, the south is actually</p> <p>25 rooms, so it's where people would live, would be myself,</p> <p style="text-align: center;">Page 74</p>	<p>1 alarm when there's a security incident?</p> <p>2 A. No.</p> <p>3 Q. We have heard others say that there could be</p> <p>4 a difference because one could manually flick the alarm</p> <p>5 on and off and make an intermittent signal. Is that</p> <p>6 something you are aware of?</p> <p>7 A. Yes, in theory you could do that.</p> <p>8 Q. You say in theory. Does that not happen in practice?</p> <p>9 A. No.</p> <p>10 Q. Even on the one drill that you did?</p> <p>11 A. No.</p> <p>12 Q. So how would somebody know it was a security alarm and</p> <p>13 not a health and safety alarm?</p> <p>14 A. The CPF and IBO did not have a security alarm and up</p> <p>15 until the attack work was actually ongoing to install</p> <p>16 one. So the system was actually being installed at the</p> <p>17 time. The same system that they have in the BdV but</p> <p>18 they didn't have a dedicated security alarm at that time</p> <p>19 for the IBO and the CPF.</p> <p>20 Q. So you say it went dark and the alarms went off?</p> <p>21 A. Yes.</p> <p>22 Q. What happened next?</p> <p>23 A. I heard, as -- I heard on the radio that there was</p> <p>24 a fire within the power generation area.</p> <p>25 Q. Just pausing there. You say you heard on the radio. Do</p> <p style="text-align: center;">Page 76</p>

<p>1 you carry a radio?</p> <p>2 A. Yes, at all times, yes.</p> <p>3 Q. And so who was giving that information out on the radio?</p> <p>4 A. That was coming I believe at the time from the control</p> <p>5 room on the CPF.</p> <p>6 Q. And the control room is where in the CPF?</p> <p>7 A. If you look on this plan where you have "CPF guardhouse"</p> <p>8 and the gate, just directly below the left-hand corner</p> <p>9 about there.</p> <p>10 Q. So it is not at the gate?</p> <p>11 A. No. It is actually within the --</p> <p>12 Q. Within the CPF?</p> <p>13 A. Correct.</p> <p>14 Q. And they were telling you there was a fire?</p> <p>15 A. They weren't telling me directly. I just heard mention</p> <p>16 of fire on there. And obviously I assumed with the fire</p> <p>17 alarms going off or the general alarm that there was</p> <p>18 a problem within that area because we'd lost power as</p> <p>19 well.</p> <p>20 Q. When you heard fire was that in English, Arabic or</p> <p>21 French?</p> <p>22 A. That was in English at the time. The language tends to</p> <p>23 change depending on the level of stress to be honest.</p> <p>24 It goes from English, French and then defaults to Arabic</p> <p>25 usually.</p> <p style="text-align: center;">Page 77</p>	<p>1 A. I can recognise the sound of a gunshot.</p> <p>2 Q. And how many shots?</p> <p>3 A. I heard two at that stage.</p> <p>4 Q. What happened next?</p> <p>5 A. I went across to the fire station and briefed the fire</p> <p>6 team to get ready to man their vehicles and I would</p> <p>7 proceed to the CPF. So my role normally would be, go to</p> <p>8 the control room, see what the situation was and then</p> <p>9 decide whether it was actually safe bringing people up</p> <p>10 there to deal with the incident because we don't want to</p> <p>11 bring more people on if there's a potential explosion or</p> <p>12 whatever. We don't actually move people through the</p> <p>13 site.</p> <p>14 Q. You say you heard shots?</p> <p>15 A. Yes.</p> <p>16 Q. When you wrote your witness statement back</p> <p>17 in January 2013 you said there was a single gunshot?</p> <p>18 A. Okay.</p> <p>19 Q. Are you able now to say which of those is likely to be</p> <p>20 accurate?</p> <p>21 A. I can't, no.</p> <p>22 Q. Could you tell where the gunshot was coming from?</p> <p>23 A. From -- well at the time as I exited from the left,</p> <p>24 which would be the direction of the entrance to the IBO</p> <p>25 and CPF.</p> <p style="text-align: center;">Page 79</p>
<p>1 Q. So you heard "fire". You were in the building at this</p> <p>2 time?</p> <p>3 A. I was, yes.</p> <p>4 Q. And what did you do next?</p> <p>5 A. At that time I walked out of the front door to basically</p> <p>6 muster my crew. My remit would be to go directly to the</p> <p>7 control room where I would basically give advice on how</p> <p>8 best to contain a fire situation, whether to intervene,</p> <p>9 whether to attack it or protect, you know, how we can</p> <p>10 protect the plant. So I asked the guys to get suited</p> <p>11 and booted as we say.</p> <p>12 Q. Pausing there. If you were to do that you would have to</p> <p>13 walk from the HSE building down the grey road we see</p> <p>14 through the gate into the CPF --</p> <p>15 A. Yes, I would.</p> <p>16 Q. -- to the control room?</p> <p>17 A. Yes.</p> <p>18 Q. But you were getting suited and booted. Where do you</p> <p>19 get suited and booted?</p> <p>20 A. In the fire station. So I had just came out the door</p> <p>21 and as I came out the doors I heard the first shots,</p> <p>22 just as I exited the HSE.</p> <p>23 Q. And you heard shots?</p> <p>24 A. I heard shots, yes.</p> <p>25 Q. Are you -- why do you say they are shots?</p> <p style="text-align: center;">Page 78</p>	<p>1 Q. So to your left, I can't tell from this plan which way</p> <p>2 you are facing when you exit but you say by the?</p> <p>3 A. Well, from the direction of the entrance to the IBO.</p> <p>4 Q. And having heard a gunshot you were still about to</p> <p>5 proceed in that direction?</p> <p>6 A. Yes, I was.</p> <p>7 Q. What happened next?</p> <p>8 A. I proceeded towards, if we just look on the plan, you</p> <p>9 can see -- if you follow the road in that direction you</p> <p>10 will see a large white building which is a vehicle</p> <p>11 workshop.</p> <p>12 Q. The building that looks like it has grey road all around</p> <p>13 it almost apart from on the southwest side?</p> <p>14 A. Yes, I was adjacent to that when one of my colleagues,</p> <p>15 who is an HSE engineer, he had actually run off in the</p> <p>16 direction originally, when we heard the first shot he</p> <p>17 had darted off in that direction to see what was</p> <p>18 happening. He then accosted me and said basically, "you</p> <p>19 need to get away it's a terrorist attack".</p> <p>20 Q. Was he an expat or Algerian?</p> <p>21 A. Algerian.</p> <p>22 Q. And he said "it's a terrorist attack"?</p> <p>23 A. Yes.</p> <p>24 Q. At that time did you understand why he was saying that</p> <p>25 or what he'd seen?</p> <p style="text-align: center;">Page 80</p>

<p>1 A. I was in disbelief to be honest. I did actually say 2 "How do you know? How can you confirm that?" And he 3 did say they had actually got hold of him, taken his 4 radio off of him and asked if there were any expats in 5 his area but because he was Algerian they had let him 6 go. 7 Q. And did he tell you anything about who had got hold of 8 him, any descriptions or -- 9 A. Yes, I did say "how do you know they're terrorists?" He 10 did say they definitely weren't Algerians because of the 11 language. I think he said one was Libyan Arabic and 12 I think another he said was Egyptian Arabic. He 13 recognised the dialect. He said they weren't Algerian 14 at that time. 15 Q. At that time was anything else happening apart from -- 16 A. I just remember there was a lot of abandoned things 17 around, vehicles sat with doors open, engines running, 18 lights on but nobody about. I was also approached at 19 that time as well by another national who, he normally 20 runs the fuel pumps filling up vehicles and so on and to 21 be honest it was the sheer look of terror on his face 22 that convinced me that something was seriously wrong. 23 Q. When you said a lot of vehicles around. How many 24 vehicles? 25 A. Well there was -- by that parking area or that area at Page 81</p>	<p>1 A. I went back. Very quickly all the locals disappeared. 2 I remember being stood there on my own because they 3 hadn't done what I had asked, as in shut down, turned 4 the lights out. We had an emergency generator in the 5 fire station. That had actually started so there were 6 lights on. They had left the fire engines with the blue 7 lights going and the lights on and the engines running 8 and they had all basically run back to their cabins. 9 Q. Just to be clear, you are saying the fire station? 10 A. Yes, the fire station, it's directly opposite the HSE 11 building. 12 Q. We can see two white squares -- 13 A. Yes. 14 Q. -- with what look like two vehicles outside of them. Is 15 that the fire station? 16 A. That's the fire station. 17 Q. So the vehicles had been prepared and had blue lights 18 going? 19 A. Engines running, blue lights going, yes. 20 Q. But your colleagues weren't to be seen at that time? 21 A. No, they abandoned it. 22 Q. So where did you go next? 23 A. I went into the fire station, turned the lights out, 24 I turned the engines off on the vehicles and operated 25 the isolation switches. So it basically turned them off Page 83</p>
<p>1 the corner of that there was, I remember a white, there 2 was a white pickup there. There was another one to the 3 front of it as well, but it looked as though people had 4 basically just stopped to get out of their vehicles and 5 left them. 6 Q. When you say by the parking area. That long thin white 7 building? 8 A. No, no. The same one, the sort of the square one where 9 it looks like the road goes all around it. There was 10 one to the front and one to the side of that, that I can 11 remember. 12 Q. So in a sense in the IBO area rather than the CPF area? 13 A. Yes, this was all within -- I never got as far as the 14 CPF so this was still within the IBO. 15 Q. What happened next? 16 A. From there I headed back towards the fire station again 17 with my two colleagues that I spoke of and we warned the 18 rest of the guys. We basically said to shut down the 19 area, lock down and go back to their cabins. 20 Q. You had said that there were only two of you who stayed 21 overnight in the IBO, yourself and Murielle Ravey? 22 A. Yes, two expats. 23 Q. Were there any other expats there with you? 24 A. No, the rest were the Algerian fire team. 25 Q. And then what happened next? Page 82</p>	<p>1 at the battery and then at that point I went back to the 2 building to basically meet up with the -- there were 3 other expats there who had arrived from work, not who 4 lived there, in the HSE building and we locked ourselves 5 into the what was the HSE manager's office. 6 Q. Then what happened? 7 A. We locked ourselves in. We covered up all the windows 8 with, you know, any bits of paper or anything we could 9 find and from there we waited out. We still had mobile 10 phone communications at that time and we had obviously 11 the radio. So we were monitoring what was happening on 12 the radio. Most of the traffic was then quite frantic 13 in Arabic so to be honest we didn't understand what was 14 going on. But what we did do is we rang the IMT at 15 Hassi Messaoud to see if they could give us an idea of 16 what was happening. At that point we were not aware 17 that anywhere else was involved. We thought it was 18 probably just the IBO and the CPF. 19 Q. Did there come a time when you became aware something 20 else was happening? 21 A. Yes, I mean, later on, well, quite early on at that time 22 we did then hear of other gunshots going on. Both in 23 the distance and closer to where we were as well. 24 Q. Can I just ask you about those other gunshots. When did 25 you first hear them? Page 84</p>

1 **A. It was probably, I can't ascertain to be honest the**
 2 **exact time but probably, you know, half an hour or so**
 3 **after we were initially locked down and the ones we were**
 4 **hearing were more in the distance than closer to the**
 5 **IBO.**
 6 Q. What was it that you heard?
 7 **A. Gunshots basically. What I would determine as both**
 8 **single shots and automatic fire.**
 9 Q. What you said in your January 2013 witness statement was
 10 that you described going back to the office --
 11 **A. Yes.**
 12 Q. -- and blacking out the windows as you described and
 13 then you said "we hadn't been in the office for long
 14 when we started to hear regular and sustained gunfire."
 15 **A. Yes. So long -- how long is long? I don't know. I say**
 16 **probably half an hour. It may have been earlier.**
 17 **I honestly can't recall.**
 18 Q. How clear are you that they were the first shots from
 19 another place that you heard was at that point rather
 20 than might you have missed shots sooner on when you were
 21 outside?
 22 **A. Possibly. It may be, you know, now I know obviously**
 23 **that there was the attack on the bus. I don't believe**
 24 **I heard those shots because I think that was probably**
 25 **slightly earlier than when I heard the first gunfire.**

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1 Q. Setting aside what you have learnt since and what you
 2 have been told by other people about timings because you
 3 are somebody who says you can recognise the sound of
 4 gunfire?
 5 **A. Yes.**
 6 Q. I am interested in when was the first time you heard
 7 gunfire from another place compared to the first shot
 8 you've heard at the CPF.
 9 **A. I can't give you a definite time, but, you know, some**
 10 **time after we had actually been in the room. The first**
 11 **shot I heard was from within the IBO. Of that I'm quite**
 12 **clear because of the proximity of the noise, but the**
 13 **more sustained gunfire afterwards was definitely further**
 14 **away. The timing? You know, I don't know.**
 15 Q. Are you able to help, given the location of the BdV, the
 16 VCP1 and the CPF, whether if there had been firing at
 17 VCP1 before the first shot at the CPF you would have
 18 heard it?
 19 **A. No, I think that was probably too far away. But, you**
 20 **know -- I can't -- I honestly couldn't say that I could**
 21 **have heard it from there.**
 22 Q. Were you able to tell the location of the shots that you
 23 did hear?
 24 **A. Just the initial ones were, I would have said, within**
 25 **the direction of the entrance to the IBO. The others**

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1 **I could only say were from further away. You know,**
 2 **assuming it is the BdV.**
 3 Q. So then I think you said that people had started to send
 4 text messages and make communications with people?
 5 **A. Yes.**
 6 Q. Who did you communicate with?
 7 **A. At the time the only person I had been communicating**
 8 **with was the IMT manager at Hassi and it was he who**
 9 **actually then confirmed to me that this was**
 10 **a simultaneous attack in a number of areas in the**
 11 **facility and to basically stay put.**
 12 Q. I think you managed to get hold of a satellite
 13 telephone?
 14 **A. I did. Yes. Luckily enough in our buildings there is**
 15 **a secondary incident management room and that is**
 16 **equipped with satellite comms so I did actually leave**
 17 **our hiding space as it was to specifically get that**
 18 **phone.**
 19 Q. And at any time during the events did you see any of the
 20 attackers?
 21 **A. No.**
 22 Q. Was there a time when you heard any of them?
 23 **A. I can't -- I honestly can't say. The time we were in**
 24 **there we heard noises. We heard shouting. Whether that**
 25 **was the attackers, whether that was other people,**

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1 **nationals or what I couldn't say as I didn't actually**
 2 **see.**
 3 Q. And then I think there came a time when the intervention
 4 team, colleagues came, reappeared and spoke with you?
 5 **A. Yes, yes, they did.**
 6 Q. And what did they tell you?
 7 **A. That they had obviously been able to monitor the**
 8 **communications because obviously they understood the**
 9 **language and they had -- they basically confirmed that**
 10 **the terrorists were actually using our own radios on**
 11 **channel 3 and were actually speaking quite freely about**
 12 **what they were doing. That they had had hostages and**
 13 **they were planning to move them up to the IBO as well.**
 14 Q. And that was on the first day that you learnt that?
 15 **A. That was quite late on. I think that was probably the**
 16 **early hours of the second morning when the initial sort**
 17 **of attack by the military on the BdV started.**
 18 Q. At that stage you learnt that they were planning to move
 19 hostages?
 20 **A. Yes, correct.**
 21 Q. And then I think you stayed hidden in your offices and
 22 then in your accommodation?
 23 **A. Yes.**
 24 Q. And the next morning made were plans to leave?
 25 **A. Yes.**

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1 Q. Can you tell us about that?
 2 **A. Initially our plan was actually to go the next evening**
 3 **under cover of darkness. We had access to cutting**
 4 **equipment in the fire station and so we could cut**
 5 **through the fence to the rear. The plan was actually to**
 6 **wait until the following evening. We were actually**
 7 **going to move locations across the way to the store**
 8 **within the medical centre and hide there because we**
 9 **thought if they're going to look they're going to look**
 10 **within the accommodation areas.**
 11 We were persuaded that was a bad idea by our
 12 Algerian colleagues purely because by then they had
 13 learnt that they were actually intending to regroup at
 14 the IBO ie the terrorists were going to move the
 15 hostages and regroup there as the military were pushing
 16 forward the offensive on the BdV. So they said that now
 17 really that morning would be a better time to go. And
 18 also if you move at night in the desert the military
 19 would be more likely to shoot you first basically and
 20 ask questions later was how it was put.
 21 So that was the sort of deciding point to go that
 22 morning rather than wait until evening.
 23 Q. I think you did in fact go with your colleagues?
 24 **A. We did.**
 25 Q. And cut a hole in the fence?
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1 **A. We cut through the fence and basically directly to the**
 2 **rear of that HSE building.**
 3 Q. And your Algerian colleagues assisted you with some
 4 clothing to hide your nationality?
 5 **A. Yes, yes. They -- some of the guys they just put on the**
 6 **coveralls, but a few of them had quite distinctive**
 7 **features, shall we say, you know, long hair, blonde**
 8 **hair, whatever which would have made them look expats,**
 9 **so various woolly hats and things were donned just to**
 10 **tone down the look as it were.**
 11 Q. Then I think you managed to get out into the desert and
 12 then eventually were met by soldiers?
 13 **A. Yes, they were Gendarmes, yes. We weren't walking for**
 14 **too long. The original plan was to head out sort of**
 15 **heading towards the left, more northerly, to go away**
 16 **from the road and actually come in behind VCP1 because**
 17 **we knew from radio comms that actually the military had**
 18 **a sort of rendezvous or a control point at VCP1. So we**
 19 **were going to sort of head out and then back track in**
 20 **behind VCP1. We were met by a Gendarme patrol quite**
 21 **early on, probably, certainly within a kilometre anyway**
 22 **and there were a number of Gendarmes dug in, as it were.**
 23 Q. And they took you to safety at VCP1?
 24 **A. Yes, they basically walked us back to VCP1.**
 25 Q. Just going back to some of the issues of security. In
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1 your witness statement you express some views about
 2 security at the site.
 3 **A. Yes.**
 4 Q. Had there been a change in the level of security
 5 recently in terms of the services provided by the
 6 civilian guards?
 7 **A. Yes, it had degraded.**
 8 Q. In what way?
 9 **A. Vehicle checks was one of the big ones. It was never**
 10 **brilliant to be honest but it did degrade. They paid**
 11 **lip service to it is what I would say. They were**
 12 **selective really on who they searched. I mean, you were**
 13 **more likely to be searched as an expat because they**
 14 **wanted to be seen to be doing their job, but they would**
 15 **just sort of wave their friends or colleagues through**
 16 **a lot of the time.**
 17 Q. And in terms of the CCTV, did you ever have occasion to
 18 look at the CCTV images --
 19 **A. I would only at the CCTV if I was within the control**
 20 **room at the CPF but that would be mainly for planned**
 21 **issues, fire, explosion, things like that, monitoring an**
 22 **area if there was a potential problem in it.**
 23 Q. And was that monitoring the inside of the CPF or the
 24 outside of the perimeter?
 25 **A. That was normally monitoring the plant itself so inside.**
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1 **I wouldn't be involved in sort of the security picture**
 2 **as it were that they were looking at.**
 3 Q. I think you attended a meeting on 12 January --
 4 **A. Yes.**
 5 Q. -- at which Paul Morgan passed some -- the FIMT meeting
 6 it is called?
 7 **A. Yes.**
 8 Q. At which Paul Morgan passed some information to you.
 9 What was that information?
 10 **A. Is this the FIMT meeting or the meeting I had afterwards**
 11 **privately with Paul and Yann?**
 12 Q. Tell us about both.
 13 **A. Okay, there was an IMT meeting which was a normal**
 14 **routine -- was that a Saturday?**
 15 Q. Saturday 12 January.
 16 **A. Saturday, yes. So there was the routine IMT meeting**
 17 **which is held every Saturday but I believe it was on the**
 18 **Sunday I think, I had a further meeting with Paul and**
 19 **Yann and there was Garry and myself.**
 20 Q. Garry?
 21 **A. Gary Rose, my back-to-back. After the exercise had been**
 22 **cancelled I had a further meeting with Paul and Yann.**
 23 Q. What did Paul say then?
 24 **A. Paul was extremely frustrated. He said he'd had enough.**
 25 **His words were "I can no longer guarantee the security**
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1 of the expats. We've lost control of security. I've
 2 tried telling them and no one will listen." I remember
 3 it quite distinctly. He said "When I leave that's it.
 4 I'm not coming back."
 5 Q. The phrase "we've lost control of security" can be taken
 6 in two ways?
 7 A. Yes.
 8 Q. One is "it is not under my control any more" as opposed
 9 to security is out of control. Did you get an
 10 impression of how he was meaning it or is it not
 11 possible to say?
 12 A. It is possible to say he actually meant it in both ways.
 13 He had lost control. As Norman described they had lost
 14 the managerial function of overseeing the work of the
 15 guys and secondly we had the incident previous to that
 16 of people and equipment being brought on base for the
 17 strikers. They had managed to bring a marquee in and
 18 erect it on site. They had managed to have family
 19 members and so on. Paul was quite annoyed by the fact
 20 that when he actually went and spoke to the guards were
 21 they aware if anybody has been brought on site they said
 22 no. But when he went and looked in the tent there were
 23 all the families and strangers and civilians, as it
 24 were, who had been brought into the base to which the
 25 guards all denied but, you know, they had to be the

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1 people who let them in. So by that I am assuming he
 2 means, you know, they've lost control in terms of people
 3 can have free access or bring what they want on to the
 4 base and also he no longer had a remit to actually
 5 control or manage these guys.
 6 Q. Around that time, around 12 January, did you notice any
 7 change in the activity of the Gendarmes?
 8 A. No.
 9 Q. Can I remind you what you said in your witness
 10 statement?
 11 A. Yes.
 12 Q. Which was that, and this is after you give the account
 13 of a meeting on 12 January at which you say
 14 Paul Morgan --
 15 A. Yes, I can -- yes, if it's that we were told by Paul,
 16 sorry, yes, at that IMT meeting that due to, I think it
 17 was to do with the French moving into Mali that the
 18 Gendarmes were going to carry out QRA drills around the
 19 base.
 20 Q. QRA?
 21 A. Sorry, QRF, quick reaction drills around the base so
 22 just to be aware if we did see any activities of the
 23 Gendarmes going about that was what they were doing.
 24 Q. Did you see that activity?
 25 A. No. This was partly one of the reasons why we, I sort

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1 of assumed that initially when I heard gunfire on the
 2 first morning I thought maybe it is the Gendarmes doing
 3 a drill, firing blanks or whatever. But we knew then
 4 that they weren't allowed to be, to have weapons within
 5 the IBO or the CPF. But it was an initial thought.
 6 Q. Can I just ask about you saying you didn't see any
 7 activity because what you said in January 2013 was:
 8 "In general I noticed there seemed to be more
 9 activity by the Gendarmes with vehicle patrols in the
 10 area. Usually you would rarely see them but after it
 11 was discussed at the meeting I noticed they were
 12 patrolling more than normal."
 13 Which account is correct?
 14 A. Probably -- yes, you would see them in the evenings
 15 drive pass because to the rear of our building there was
 16 a track that run down there, so you would occasionally
 17 see vehicles driving down there. It may be after that
 18 meeting it, was it more in my head at the time.
 19 Q. This implies that you noticed a change and that there
 20 was an increase in patrols after 12 January?
 21 A. Yes.
 22 Q. Can you help us with -- is that accurate?
 23 A. If that's what I've said then that would be the case.
 24 Q. Just one last thing. I think after all of the events
 25 you were at In Amenas town when you spoke to one of the

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1 workers that worked with you, S. Do you remember
 2 a conversation with him?
 3 A. It was very brief but yes, I do remember speaking to
 4 him.
 5 Q. What did he tell you?
 6 A. That he had been in the car with Paul when he had been
 7 shot and that he had been shot in the foot but he was
 8 obviously still very shocked and at that time didn't
 9 really want to talk about it.
 10 THE CORONER: That's when he, S, is shot in the foot is it?
 11 A. Yes, S was shot in the foot.
 12 MS DOLAN: Did he tell you any more detail about what
 13 happened to Paul?
 14 A. No.
 15 Q. Nothing at all about how he was killed or when he was
 16 killed?
 17 A. No, not that I recall.
 18 Q. So can you just again tell us what you do recall him
 19 saying?
 20 A. Just that he was with Paul, that they were in the
 21 vehicle and that basically they'd both been shot. Paul
 22 had been shot and he'd been shot in the foot. But he
 23 was quite distressed at that point. I didn't want to
 24 labour the point.
 25 MS DOLAN: Thank you, Mr Jones. I don't have any more

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<p>1 questions for you but others will.</p> <p>2 Questions from MR PERFECT</p> <p>3 MR PERFECT: Good afternoon, Mr Jones. My name is Andrew</p> <p>4 Perfect and I am asking questions on behalf of the</p> <p>5 family of Stephen Green.</p> <p>6 Only two short areas from me. You talk about</p> <p>7 exercises and how an exercise was long overdue. Is that</p> <p>8 right, that you hadn't been able to have a sort of</p> <p>9 emergency exercise for some time?</p> <p>10 A. Of that magnitude, yes.</p> <p>11 Q. Of that magnitude. So what, talk me through it. You</p> <p>12 had smaller exercises?</p> <p>13 A. Yes, normally we'd have a smaller exercise once a month</p> <p>14 that, that just involved our LIMT and our intervention</p> <p>15 team. We didn't normally escalate them outside the</p> <p>16 facility.</p> <p>17 Q. How frequently would you have hoped to have a larger</p> <p>18 exercise?</p> <p>19 A. That we would escalate off the base? Normally once</p> <p>20 a year.</p> <p>21 Q. And so what is the last time prior to the planned one</p> <p>22 that you had on 13 January, what is the last one prior</p> <p>23 to that?</p> <p>24 A. I can't recall having done one prior to that to be</p> <p>25 honest.</p> <p style="text-align: center;">Page 97</p>	<p>1 is that right?</p> <p>2 A. Correct, yes.</p> <p>3 Q. And the problem that you had was getting everyone to and</p> <p>4 from that being expats, other Algerian workers and your</p> <p>5 Gendarmes getting them out all to the site, the</p> <p>6 Gendarmes protecting the expats as they have to escort</p> <p>7 them. It was a logistical problem?</p> <p>8 A. Yes.</p> <p>9 Q. Were you aware of any other logistical problems arising</p> <p>10 previously, not specific to your exercise, previously</p> <p>11 because of problems with drivers, particularly in</p> <p>12 respect of the Gendarmes?</p> <p>13 A. Yes, I mean, the drivers were normally required to drive</p> <p>14 the Gendarmes for the escorts to and from the airport</p> <p>15 which is why, you know, we demanded earlier on in the</p> <p>16 year because of the problems of actually moving people</p> <p>17 for crew change.</p> <p>18 Q. Were you aware if there was any other problems with</p> <p>19 respect to the drivers and the Gendarmes other than</p> <p>20 escorting expats?</p> <p>21 A. No.</p> <p>22 Q. Now, talking about the radio. Did I hear you say you</p> <p>23 had a radio for the entirety of the time that you were</p> <p>24 hiding at the CPF?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 99</p>
<p>1 Q. What time did that cover?</p> <p>2 A. At that stage that probably would have covered</p> <p>3 a three-year period. We had been trying for nearly</p> <p>4 18 months before then to actually do one, so the last</p> <p>5 one was probably done before my time there to be honest.</p> <p>6 Q. This exercise you had planned for 13 January was a big</p> <p>7 deal, was it?</p> <p>8 A. Yes, it was, yes.</p> <p>9 Q. It had been long in the planning?</p> <p>10 A. Yes, it was. That is why I said it required the two of</p> <p>11 us to actually be on site at the same time which was</p> <p>12 unusual.</p> <p>13 Q. Talk me through if you can, with more specificity, why</p> <p>14 it is that the strike stopped this exercise from going</p> <p>15 ahead, to your understanding?</p> <p>16 A. The actual exercise itself was due to take place off the</p> <p>17 base so it would have been beyond the VCP. Therefore,</p> <p>18 it would have required Gendarme escort and military</p> <p>19 assistance. That would then obviously require the</p> <p>20 drivers who would drive them but also the drivers as</p> <p>21 well to logistically move vehicles and buses, transport</p> <p>22 people and so on to actually set up the exercise. So it</p> <p>23 was outside the base.</p> <p>24 Q. So it wasn't just that it was outside the base, it was</p> <p>25 past VCP1 that you were planning on having the exercise,</p> <p style="text-align: center;">Page 98</p>	<p>1 Q. And so you heard presumably a lot of the chatter that</p> <p>2 was going on between the attackers, some of the BdV and</p> <p>3 some of the CPF, is that right?</p> <p>4 A. I can hear chatter -- I can't determine who they were</p> <p>5 because it was Arabic. I don't speak Arabic.</p> <p>6 Q. That was my next question. Presumably it was in Arabic</p> <p>7 and you didn't understand it?</p> <p>8 A. Correct.</p> <p>9 Q. So your understanding of what the chatter was stems</p> <p>10 entirely from what you were told by Algerian colleagues</p> <p>11 who did understand?</p> <p>12 A. That's correct.</p> <p>13 Q. Did those Arabic colleagues tell you anything specific</p> <p>14 or particular about the potential move from the BdV to</p> <p>15 the CPF?</p> <p>16 A. They did, yes.</p> <p>17 Q. Explain, talk us through that?</p> <p>18 A. They told us that was in the morning when we were</p> <p>19 discussing a plan to go and they said that the</p> <p>20 terrorists were planning on moving the hostages from the</p> <p>21 BdV to the CPF.</p> <p>22 Q. Had they been able to discern any reason why that was?</p> <p>23 A. Because the military were -- they basically had an</p> <p>24 offensive against the BdV. So they said the military</p> <p>25 were moving into the BdV, the terrorists were then going</p> <p style="text-align: center;">Page 100</p>

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<p>1 to move out with the hostages.</p> <p>2 Q. And your understanding was that the intention was to get</p> <p>3 the hostages from the BdV to the CPF, is that how it was</p> <p>4 explained to you?</p> <p>5 A. Correct.</p> <p>6 MR SHARGHY: I am obliged.</p> <p>7 Questions from MS GERRY</p> <p>8 MS GERRY: Mr Jones, obviously the reason for having</p> <p>9 simulations and conducting drills is to identify any</p> <p>10 possible weaknesses within the emergency response, is</p> <p>11 that right?</p> <p>12 A. Yes.</p> <p>13 Q. As I understand it, you recall that there was one drill</p> <p>14 completed in terms of security alarm and a response to</p> <p>15 that?</p> <p>16 A. Yes.</p> <p>17 Q. Can you remember whether there were any weaknesses</p> <p>18 identified when that drill took place?</p> <p>19 A. There was. The main concern with that was rather than</p> <p>20 people go into hiding they actually mustered. A lot of</p> <p>21 people mustered.</p> <p>22 Q. Do you know what the response was to that?</p> <p>23 A. Well, afterwards there is a report drawn up. The report</p> <p>24 would be circulated. At the time as well people were</p> <p>25 also telling them that, you know, listen to the alarm,</p> <p style="text-align: center;">Page 101</p>	<p>1 Q. In your statement at paragraph 6 you mentioned that at</p> <p>2 around 5.45 you heard Yankee 3 call to Papa Charlie,</p> <p>3 which is the radio control room, to say the convoy was</p> <p>4 leaving for the airport?</p> <p>5 A. Yes, this is in the first morning, yes.</p> <p>6 Q. Yankee 3 presumably, I think that is the OLS, is that</p> <p>7 right?</p> <p>8 A. Yes, the national, the Algerian.</p> <p>9 Q. So that would have been the driver with Paul Morgan?</p> <p>10 A. I honestly don't know. I'm not sure if that was his</p> <p>11 title or not to be honest.</p> <p>12 Q. But in any event, you heard that and I can take it from</p> <p>13 that that anyone listening to that through that channel</p> <p>14 would have heard that as well?</p> <p>15 A. Yes, they would.</p> <p>16 Q. You then go on to say it was almost a minute, you say</p> <p>17 literally a minute or two later there was a total black</p> <p>18 out in the building?</p> <p>19 A. Yes.</p> <p>20 Q. So you are able to time that black out because of your</p> <p>21 remembering the time of hearing the call on the radio?</p> <p>22 A. Yes, I also remember, you know, looking at the time as</p> <p>23 well. I do that mainly because I usually have to write</p> <p>24 a report on it afterwards so I will take notes. The</p> <p>25 whole event I recorded on a whiteboard in the office.</p> <p style="text-align: center;">Page 103</p>
<p>1 it's not the usual tone. You need to go into hiding.</p> <p>2 So we did have people who were actually monitoring what</p> <p>3 was going on, but lack of familiarity with the tone.</p> <p>4 People heard the alarm. It is quite similar. It is the</p> <p>5 same tone but it is either intermittent or a single tone</p> <p>6 and I guess with a lack of familiarity they hear the</p> <p>7 alarm they went into muster mode rather than lock down.</p> <p>8 Q. Can you recall when that security drill was?</p> <p>9 A. I can't to be honest, no.</p> <p>10 Q. Roughly in terms of years?</p> <p>11 A. It would have been within the year of the attack.</p> <p>12 Q. So 2012?</p> <p>13 A. Yes.</p> <p>14 Q. Do you know how extensive that drill was? Was there any</p> <p>15 simulations or anything of that nature?</p> <p>16 A. It was just within the BdV and the companies camp area.</p> <p>17 It didn't include IBO and CPF.</p> <p>18 Q. Was it just sound the alarm and see how people react or</p> <p>19 was there a simulation that something was happening?</p> <p>20 A. No, it was just literally sound the alarm and observe</p> <p>21 the action.</p> <p>22 Q. So in terms of any possible weaknesses of identifying</p> <p>23 where the attack was coming from or who was going to</p> <p>24 communicate with whom, none of that was tested out?</p> <p>25 A. No, it was mainly the response to the alarm itself.</p> <p style="text-align: center;">Page 102</p>	<p>1 Q. The whole event being what?</p> <p>2 A. From the start of the black out, the time we were</p> <p>3 hidden -- everything. There was a timeline as it were,</p> <p>4 that was recorded on the board in the office.</p> <p>5 Q. You make reference in your statement to completing</p> <p>6 a journal. Did you do that having completed the</p> <p>7 whiteboard, is that how you were able to complete it?</p> <p>8 A. Yes, before we left I actually wrote down what was on</p> <p>9 the board and took a hard copy of it.</p> <p>10 Q. So just going through the sequence then. Around 5.45</p> <p>11 you hear the call. About five minutes later total black</p> <p>12 out. When did you see the cars, the abandoned cars?</p> <p>13 A. When I was en route to the CPF. That would have been</p> <p>14 around 5.55. It wasn't very long. It was minutes after</p> <p>15 the initial black out.</p> <p>16 Q. And you say you saw a couple of or at least a couple of</p> <p>17 pickups. Were they JV vehicles?</p> <p>18 A. Yes, they were.</p> <p>19 Q. Other than pickups, can you remember any other types of</p> <p>20 cars?</p> <p>21 A. No, those were the only vehicles that I seen.</p> <p>22 Q. You obviously have explained how you heard during the</p> <p>23 course of the attack conversations going on over the</p> <p>24 radios. Did you ever hear anything from Papa Charlie?</p> <p>25 A. I can't recall.</p> <p style="text-align: center;">Page 104</p>

1 Q. Would it be the case that if there was something from
 2 someone, any kind of direction or instruction from Papa
 3 Charlie that he would identify himself with his call
 4 sign? Is that how you know --
 5 **A. Yes, he would, yes.**
 6 Q. How easy is it to operate these radios and to know what
 7 channel to use in order to communicate?
 8 **A. It's very easy. Just two switches. One for a channel
 9 and on/off, volume.**
 10 Q. And just finally, in relation to the CCTV are you aware
 11 of whether it was regularly stored and downloaded?
 12 **A. Yes, it is because I've had to rely on it myself for
 13 a fire investigation where we've actually had incidents.
 14 We have downloaded the actual video of a fire event for
 15 example for investigation purposes.**
 16 Q. So two questions. One is, is it down regularly in any
 17 event and if so how frequently?
 18 **A. I don't know but I know that any time I've required to
 19 see it I've had no problem accessing it. Whether they
 20 have downloaded it specifically for me or whether it's
 21 for my store, I can't say.**
 22 Q. Can you recall on those occasions how many days or weeks
 23 previous you asked to see it? So for example, can I see
 24 yesterday's CCTV or can I see last week's or --
 25 **A. I honestly don't know how long it's stored for.**

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1 Q. But you never had a problem?
 2 **A. No, no.**
 3 MS GERRY: I have no further questions.
 4 Questions from MS GOLLOP
 5 MS GOLLOP: I am asking questions on behalf of Belinda
 6 Green, Stephen Green's wife. Do you remember
 7 Stephen Green?
 8 **A. Yes, I did work with him.**
 9 Q. Have you been back to Algeria since the attack?
 10 **A. I have, I still work on that site.**
 11 Q. Are you aware of any investigation that the Algerians
 12 are carrying out into the attack?
 13 **A. No.**
 14 Q. Have you been interviewed by Statoil for the purposes of
 15 their investigation?
 16 **A. No.**
 17 Q. You were asked some questions about being able to or
 18 having a sort of translation of what could be heard on
 19 the radio from the terrorists. Can you tell us anything
 20 more in addition to what you have already told us?
 21 **A. No, the main conversation I had with the guys really was
 22 that on the first morning after when they were moving.
 23 We briefly spoke the night before when we actually moved
 24 from the office location down into one of the rooms and
 25 the guys had said that they had been monitoring the**

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1 **radios and the terrorists were talking actually quite
 2 openly. Basically the guys were just confirming what we
 3 had already heard ourselves from the IMT team that it
 4 was a site wide incident. That they were actually, they
 5 had attacked all the bases and the bus and they had
 6 taken hostages, but nothing more specific.**
 7 Q. Can you remember anything being said about the
 8 terrorists having any intention to detonate the CPF?
 9 **A. Yes, they did actually, yes. So there was -- I think
 10 they did mention that they were planning on actually --
 11 yes, detonating the CPF.**
 12 Q. So the plan was not only to transport their hostages
 13 from the BdV to the CPF but also to blow the CPF up once
 14 they got there?
 15 **A. That's correct, yes.**
 16 Q. Finally, I want to ask you some questions about Gary
 17 Rose, your back-to-back.
 18 **A. Yes.**
 19 Q. The two of you worked quite closely together insofar as
 20 you can, not seeing each other?
 21 **A. As far as we can as back-to-backs, yes. As I say, that
 22 was the only occasion, apart from when I actually
 23 started the job, we had a handover period, but that was
 24 the only period we were on site together was the week
 25 before the incident.**

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1 Q. So had you actually ever met him in between your first
 2 introduction and seeing him that week?
 3 **A. Yes, we'd worked together on a previous job, so ...**
 4 Q. Did you get on well together?
 5 **A. Yes, very well.**
 6 Q. Did you have similar views about security at the
 7 facility?
 8 **A. Yes.**
 9 Q. I want to ask you a couple of things about something he
 10 says in his witness statement. He talks about Algerian
 11 nationals using vehicles for their own private use,
 12 particularly at night. Were you aware of that
 13 happening?
 14 **A. Yes.**
 15 Q. And he also talks about raising objections with
 16 Sonatrach managers and being overruled when he did so.
 17 Did you have any experience of that?
 18 **A. Yes. My own team were renowned for it. You would hear
 19 them on their radios leaving the site at night in
 20 vehicles. There had even been a report at one time by
 21 the Gendarmes of suspicious activity in their vehicles.
 22 When we did raise it we hit a blank wall. Liaison did
 23 actually look into it because it was happening on
 24 a regular basis. We knew exactly who it was but what we
 25 couldn't do was prove it. When we asked for the**

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1 transcript of the radio calls it had disappeared. When
 2 we asked for the transcript from the guards at the gate
 3 they said they had no record. And even though the
 4 DriveRight, the spy in the cab as it was for the vehicle
 5 movements, had the guy's number, he has to put in a pin
 6 number before he drives the vehicle, was related to that
 7 guy, when questioned just said "well somebody must have
 8 used my number." It was this sort of carry on.
 9 Everybody knew it was happening but nobody could ever
 10 prove it because as it were, everybody seemed to be in
 11 on it, whatever activities they were up to.
 12 Q. Can you give us an idea of when this was happening?
 13 A. Regularly, almost every night.
 14 Q. But specifically, was it in the time after control of
 15 the civilian unarmed guards had passed to SSI or --
 16 A. No, they were always doing it. I mean, the JV vehicles
 17 certainly from my team were used regularly throughout
 18 the night. The usual excuse was they were going to the
 19 BdV to buy coffee or going to the gym or to buy
 20 cigarettes but they would use the vehicles regularly
 21 throughout the night. They weren't subject to the
 22 curfews as it were, so they could leave. It would
 23 appear they could leave freely.
 24 Q. How did they return the vehicles?
 25 A. The vehicles were allocated to them. So the vehicles

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1 were actually allocated to the fire team so they would
 2 use their pickup that was allocated to them. It stayed
 3 with them at the fire station. It was their vehicle.
 4 So they would use that.
 5 Q. And no investigation by Sonatrach?
 6 A. No.
 7 Q. And no investigation by the JV?
 8 A. No.
 9 Q. And the pin numbers that you have just spoken about you
 10 have to put those into every single JV vehicle when you
 11 get into it to drive it away?
 12 A. Yes, the vehicle still operates. What it does is record
 13 who the driver is, how far they're driven and maximum
 14 speed and so on.
 15 Q. We have heard some evidence about a night patrol and
 16 that would apply equally, would it, to the five vehicles
 17 that are used at night to patrol around zone 1?
 18 A. The military vehicles I don't believe have that system.
 19 I couldn't honestly say. But I know that the JV ones
 20 did.
 21 Q. Another thing that Mr Rose says is that he had
 22 frequently complained about the security situation to
 23 Mr Brattetieg, who is your manager --
 24 A. He is, yes.
 25 Q. -- and his manager. And did you know that Mr Rose had

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1 made such complaints?
 2 A. I was unaware of if he had made an official complaint.
 3 Q. And he says those complaints have been escalated so far
 4 as he was aware but they were ignored. Did you have any
 5 similar such experiences?
 6 A. It was -- there was a lot of discussion around security
 7 around that. It was discussed. I discussed it with
 8 John myself and how high up that was pushed or whether
 9 it was actually acknowledged I can't say but I think it
 10 is safe to say that the majority of people on that site
 11 thought that security was poor.
 12 Q. Can you be specific, when you say security was poor.
 13 What aspect of it you felt was poor?
 14 A. Control of access. I think that, you know, as I said
 15 earlier, the most obvious thing was the searching of
 16 a bag. You know, you open a bag, they don't actually
 17 touch anything in it. They just glance in it. So they
 18 don't actually rummage through it as it was. Likewise
 19 for vehicles, you could open a boot, there would be
 20 a bag in there, they wouldn't look at the bag. But
 21 a lot of the time, you know, I stood and watched them
 22 before, the expats were the ones who were more likely to
 23 be searched than the Algerians because they wanted
 24 actually to be seen to be doing a job. It is an expat,
 25 we'd better do it properly as it were. But they were

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1 less thorough with their colleagues.
 2 Q. Just so you can help Mrs Green with an understanding
 3 insofar as you can did you have a sense of why these
 4 checks were so cursory, was it laziness or indifference?
 5 Everybody is at risk if a bomb is driven into the
 6 facility so do you have a sense of what was going on?
 7 A. I think you have described it perfectly with the term
 8 you have used. Laziness and indifference to be honest.
 9 Q. Was it felt that the risk of a bomb being driven into
 10 the site wasn't a real risk, it was just a fantasy risk?
 11 A. From my own personal aspects I can only speak for
 12 myself. To me that was not the biggest risk. To me the
 13 biggest risk was the bus going down the road. It left
 14 at the same time. It was across open ground. There was
 15 only one route. You could set your watch by it. To me
 16 that was always the biggest risk and my biggest fear.
 17 On the plant, the base itself, to be honest I wouldn't
 18 have contemplated the attack that did happen. So for me
 19 the risk was always that bus on that road because you
 20 are effectively in open ground.
 21 Q. Finally, Mr Rose says that he felt that there was
 22 a culture amongst the management that anybody who
 23 criticised the security set up would be considered to be
 24 a troublemaker. Did you have a similar view?
 25 A. I wouldn't say that they would be considered to be

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1 **a troublemaker. I know that when questions were asked**
 2 **we were told that it was need to know. So, for example,**
 3 **I know I have asked the question of what is the get out**
 4 **plan if we decide that we are going to pull out of**
 5 **country or we have to go quickly, what is the plan and**
 6 **we were told it's need to know. So it was never fully**
 7 **explained how we could actually, you know, leave the**
 8 **country in a hurry if need be.**
 9 Q. Did you feel generally that you got the information that
 10 you wanted and needed about any threats to the security
 11 of the facility?
 12 **A. I had more than others purely because of the position**
 13 **that I had. So the security situation was discussed in**
 14 **the Saturday meetings for the FIMT. Any current**
 15 **problems then would be discussed then but it wasn't**
 16 **disseminated basically across the whole facility.**
 17 Q. Do you think it should have been?
 18 **A. I do, yes.**
 19 Q. Why?
 20 **A. I think that, you know, security is everybody's**
 21 **responsibility. If there is a risk or a threat I think**
 22 **it's only fair that, you know, people can make an**
 23 **informed decision whether they should continue to work**
 24 **there.**
 25 MS GOLLOP: Thank you.

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1 Questions from MR SHARGHY
 2 MR SHARGHY: Mr Jones, I ask questions on behalf of the
 3 family of Carlos Estrada. You were asked by Ms Gollop
 4 whether you were aware of any Algerian investigation but
 5 what you weren't asked specifically is whether you are
 6 aware of have been asked to provide any evidence for
 7 a BP investigation.
 8 **A. No, I haven't.**
 9 Q. The emergency exercise was quite a major exercise,
 10 wasn't it?
 11 **A. Yes.**
 12 Q. And it involved multiple parties coming from different
 13 locations from BdV, for example, and also things like
 14 the fire engines would be coming from the CPF?
 15 **A. Correct.**
 16 Q. As a result of which the Gendarmes, if they were able to
 17 move around with drivers, would be ensuring that their
 18 safe passage not just from the BdV past the VCP1 to the
 19 area of the crash but also the area in and around the
 20 CPF?
 21 **A. Yes.**
 22 Q. And their role was not just to make sure everyone gets
 23 to where they need to safely but there is some
 24 indication in your witness statement of July 2014 that
 25 you felt that they would be generally doing a patrol

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1 around the area. That's the CPF, VCP1 and the BdV?
 2 **A. Yes, well for the exercise they would actually be**
 3 **patrolling or securing the area of the exercise site**
 4 **which was outside of the VCP1.**
 5 Q. But they weren't able to do that because no drivers?
 6 **A. Correct.**
 7 Q. We have been told by other witnesses that the Gendarmes
 8 also had their own vehicles and certainly whilst the
 9 drivers were on strike it appears that they may have
 10 been using their own vehicles for patrolling. Were you
 11 aware of that?
 12 **A. I was aware they had their own vehicles, yes, and that**
 13 **they used them for patrolling but for our own purposes,**
 14 **for our own escort duties, for example, to and from the**
 15 **airport, for that exercise then they would utilise our**
 16 **vehicles.**
 17 Q. And in your July 2014 statement you seem to be slightly
 18 suspicious about the timing of the drivers strike which
 19 came on and less than 24 hours later was called off
 20 again?
 21 **A. Yes, correct. It seemed to be very, how shall I say,**
 22 **strange, that it was almost as if it was planned**
 23 **basically to stop that exercise happening.**
 24 Q. And is it your view that there may have been some kind
 25 of collusion between the drivers and potentially the

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1 terrorists?
 2 **A. Yes, it is.**
 3 Q. You were asked questions about the meeting of the
 4 12 January, in fact, the 12th is the Saturday, Sunday,
 5 was the 13th?
 6 **A. Yes.**
 7 Q. The same day as the strike is supposed to be undertaken.
 8 Paul Morgan is quite exacerbated, isn't he, about the
 9 situation regarding security?
 10 **A. Yes, he is.**
 11 Q. And Yann was also there?
 12 **A. He was.**
 13 Q. Was Yann of the same view as Paul?
 14 **A. Yann basically hadn't been there that long. I think he**
 15 **was only on his second rotation, so he wasn't really as**
 16 **up to speed on what was happening. He certainly didn't**
 17 **express it in the way that Paul did, no.**
 18 Q. You said in your July 2014 witness statement, the
 19 reference is paragraph 14, that he, being Paul Morgan,
 20 did communicate the situation to management. Are you
 21 sure those were his words?
 22 **A. His words were that "I have told them and no one has**
 23 **listened." By "them" I'm assuming it was the management**
 24 **he talked to. Whether it was the site manager or**
 25 **whether it was his own management chain within liaison**

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1 **I don't know.**
 2 Q. In relation to the attack you have indicated that you
 3 were told it was simultaneous and this inquest has heard
 4 some evidence regarding timing and certainly one of the
 5 bus witnesses was quite clear that the attack started
 6 around about 5.47. That accords with your timing
 7 doesn't it?
 8 **A. Yes, I mean, I first heard the shot at 5.50 at the IBO.**
 9 Q. But the, if I can term it this way, the lights went out
 10 at 5.47?
 11 **A. Possibly. 5.47, 5.50, but, yes, certainly within that**
 12 **time.**
 13 Q. And your information was that because the generator was
 14 either on fire or had been fired out, the term "fire"
 15 was used?
 16 **A. Correct.**
 17 Q. You have the screenshot of the aerial view regarding the
 18 CPF. Where is this generator?
 19 **A. The generator that I believed but that wasn't actually**
 20 **hit because it was a transformer that was actually hit**
 21 **that stopped it, I now know that after the event, but**
 22 **the actual generators themselves, which is the turbine**
 23 **area is, if you look just to the left where it says**
 24 **"IBO" and below "IBO car park", across to the left to**
 25 **the north of the round tank, it is in that area is the**
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1 **power generator.**
 2 THE CORONER: Is it actually going to matter where the
 3 generator is if that has nothing to do with it?
 4 **A. I assumed when they said fire in the power generation**
 5 **area that's the power generation area but we now know it**
 6 **was the transformer.**
 7 THE CORONER: We probably don't need to know where. Where
 8 is the transformer? That would be more use I think.
 9 **A. I don't honestly know where the transformer is to be**
 10 **honest.**
 11 MR SHARGHY: So round about 5.47, 5.50 when the lights go
 12 out the assumption is something or someone must have
 13 fiddled with that transformer?
 14 **A. Not necessarily. I mean, because there were a number of**
 15 **reasons why the plant may actually shut itself down.**
 16 **The strange thing at the time was that the emergency**
 17 **generator didn't start up which was a concern because**
 18 **normally when it goes out within a few minutes an**
 19 **emergency generator will kick in. So it was obviously**
 20 **something major if it had knocked out both the main**
 21 **power plus the emergency generator.**
 22 Q. You heard a gunshot or possibly two gunshots fairly
 23 close to you as you came out of the building?
 24 **A. Yes.**
 25 Q. And it didn't take you long, did it, from the lights
 Page 118

1 going out to come out of the building to find out what's
 2 going on?
 3 **A. No, very quick.**
 4 Q. And by that stage it appears the terrorists had already
 5 infiltrated the CPF perimeter?
 6 **A. Yes.**
 7 Q. And that would have meant coming through the chicane,
 8 past the guardhouse, unarmed guards, towards the IBO
 9 building or thereabouts?
 10 **A. Yes.**
 11 Q. Can you help us with this: this aerial map doesn't
 12 appear to show any T bar cement structures around the
 13 CPF. Was that your recollection at the time of this
 14 incident?
 15 **A. Yes, I believe there's just the double fence around it.**
 16 Q. And it is a fence you cut?
 17 **A. On the inside, yes.**
 18 Q. And that's a double fence there as well?
 19 **A. Yes, it is.**
 20 Q. Given time was of the essence did it actually take you
 21 that much time to cut through two fences?
 22 **A. No, less than a minute probably.**
 23 Q. What were you using?
 24 **A. Bolt croppers. I didn't personally have the bolt**
 25 **croppers but I was with the guy who did. Probably less**
 Page 119

1 **than a minute to go through both fences.**
 2 MR SHARGHY: Thank you very much.
 3 Questions from MR POPAT
 4 MR POPAT: Mr Jones, I ask questions on behalf of BP. Just
 5 in relation to the last set of questions you were asked
 6 about the CPF and T bars. Just so we are clear, you
 7 have that plan in front of you, you see towards the
 8 bottom of the photograph there are lines marked in red?
 9 **A. Yes.**
 10 Q. Which are on the key said to be T bars in that location?
 11 **A. Yes.**
 12 Q. Is that a correct representation of where the T bars
 13 were in that location?
 14 **A. I believe so, yes. It definitely wasn't surrounded by**
 15 **them.**
 16 Q. Where they are shown in the plan is correct?
 17 **A. I believe so, yes.**
 18 Q. Thank you. Just a few separate points if I may. You
 19 were asked about an Algerian investigation. But you
 20 weren't asked about materials that you may have provided
 21 to the Algerian authorities. Did I understand your
 22 witness statement correctly that you handed over
 23 something that you described as "a journal" to the
 24 Algerian military?
 25 **A. Yes, I did.**
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<p>1 Q. Is that a journal which contained your notes of the 2 events that were occurring?</p> <p>3 A. It was. It was a transcript of what I had written on 4 the whiteboard in the office.</p> <p>5 Q. So that timeline and those events were recorded into 6 a journal which you have handed over?</p> <p>7 A. Correct.</p> <p>8 Q. Was that requested from you by the military at the time 9 of the attack?</p> <p>10 A. Yes, we had effectively a short debrief with a senior 11 military officer who had asked, could we give him any 12 information and timings et cetera and rightly or wrongly 13 at the time I said "actually I've got it written down 14 here" and basically it was literally snatched from me.</p> <p>15 Q. Thank you. Muster drills. Just so we understand it. 16 Is that what it sounds like?</p> <p>17 A. Yes, muster drill, if there is an emergency fire, 18 explosion or whatever it is basically a way in which we 19 can bring everybody to one place to account for them and 20 obviously account for missing personnel as well.</p> <p>21 Q. And you were responsible for organising or at least 22 arranging those sorts of drills from time to time?</p> <p>23 A. Yes, I was.</p> <p>24 Q. Were you aware when you conducted those drills of 25 occasions when a large number of people who shouldn't</p> <p style="text-align: center;">Page 121</p>	<p>1 A. It did degrade after liaison lost the control. They no 2 longer had the power as it was to actually --</p> <p>3 Q. We know they didn't have the power but did you actually 4 observe more lapses in security post July 2012?</p> <p>5 A. Yes, it degraded.</p> <p>6 Q. Was that a point you had identified and made to liaison?</p> <p>7 A. It was made again through my manager, John Brattetieg 8 but I have to say everyone on that base was aware of the 9 standard security. We all had to go through it to get 10 on the base so everyone was aware that, you know, 11 searches weren't as good as they should be.</p> <p>12 Q. What you do say in contradistinction about physical 13 security in your witness statement, page 17, is that in 14 terms of actual physical security such as fences and 15 gates that was very good?</p> <p>16 A. Yes, everywhere was double fenced. There were sliding 17 gates, there were barriers in terms of the physical 18 barriers around, yes, that was good.</p> <p>19 Q. You also say in your statement about CCTV, that that was 20 of good quality and it covered all of the site. Just 21 one particular question about that. You described 22 a situation where the CCTV cameras at the CPF were 23 positioned inwards. So they were looking at things 24 inside the camp. Is that right?</p> <p>25 A. Inside the plant, yes.</p> <p style="text-align: center;">Page 123</p>
<p>1 have been there were found to be there?</p> <p>2 A. Yes, I was.</p> <p>3 Q. Why was that?</p> <p>4 A. We didn't get to the bottom of it. On that particular 5 drill we identified a number of people who left the base 6 and we were actually watching them and they were 7 pretending to take T cards but they weren't actually 8 taking them and on the way in again, pretending to put T 9 cards back. Liaison then went to do the investigation 10 on to that and I believe what had come was that they 11 were actually JV employees who basically were staying on 12 the base after their rotation had finished.</p> <p>13 Q. Which is something Mr Fitzpatrick told us and that would 14 be consistent with your understanding of what they found 15 following that muster drill?</p> <p>16 A. Yes, and apparently living there was better than what 17 they had to go home to.</p> <p>18 Q. You were asked a number of questions about your views on 19 security and did I understand it correctly that overall 20 your feeling was that access control was not as good as 21 it should be particularly in relation to checking of 22 bags and vehicles?</p> <p>23 A. Correct, bag searches were very poor.</p> <p>24 Q. Was the position essentially the level of access control 25 the same throughout your time at the site?</p> <p style="text-align: center;">Page 122</p>	<p>1 Q. And the reason for that?</p> <p>2 A. It was monitoring the plant for problems. So if we had 3 fire, explosion, gas leaks or whatever it was monitoring 4 the plant.</p> <p>5 Q. Was that something that was actually required to be 6 done?</p> <p>7 A. It was part of the actual fixed systems within there for 8 the security of the actual plant itself. Some of them 9 again had things like thermal imaging. Things like that 10 so they were looking for heat, fire, gas release, that 11 sort of thing as well.</p> <p>12 Q. When you say "some of them" you mean the cameras?</p> <p>13 A. Yes, the cameras.</p> <p>14 Q. Finally, the IMT meetings, they were always attended by 15 somebody from liaison?</p> <p>16 A. Yes.</p> <p>17 Q. And the purpose of the person from liaison, whether it 18 is Mr Morgan or Mr Fitzpatrick attending, was to provide 19 an update and advice on security issues?</p> <p>20 A. Yes, they would -- well, two purposes really. The first 21 was for the people at the meeting, there were different 22 departments who may require escorts for the week. So if 23 there was work going on at rig sites and well sites and 24 things that they could -- or rig moves, things like 25 that -- request security escorts that he could arrange</p> <p style="text-align: center;">Page 124</p>

31 (Pages 121 to 124)

<p>1 with the captain or with the military. But also he 2 would give an update on any known activities or threats 3 or problems that there had been within country. 4 Q. And we have heard from Mr Fitzpatrick that the intention 5 and expectation was that whatever was communicated by 6 liaison in those meetings would be cascaded down by 7 those who would be attending? 8 A. Cascaded down? It was handed out to everyone in written 9 brief form and then it was handed back in at the end of 10 the meeting. It was said, yes, you can discuss it with 11 your colleagues but the hard copy was handed back in. 12 Q. The hard copies were taken away, in fact we have been 13 told that they were required to be destroyed but the 14 purpose of the communication to heads of teams was that 15 you would be provided with information which you would 16 be not only able to cascade down but be expected to 17 cascade down. Is that not right? 18 A. Yes. 19 Q. At those meetings where there was a discussion about 20 security issues, concerns that had been identified were 21 also raised and discussed, weren't they? 22 A. Yes. 23 Q. The last of those meetings took place the day before the 24 discussion that you had with Mr Morgan? 25 A. Yes.</p> <p style="text-align: center;">Page 125</p>	<p>1 the report obviously reflects the relevant parts of the 2 interviews. Now, that may or may not be the case. 3 I don't know whether, for example, you or Mr Ferguson 4 have looked at the interview summaries that are 5 presently under discussion and there is always the 6 possibility that -- 7 MR LAIDLAW: Would you forgive the interruption, sir, I hope 8 it is helpful. We have not. 9 THE CORONER: All right. Then there we are. There is 10 always the possibility then, without having seen them, 11 that that statement may be wrong. But just suppose it 12 was right, obviously if you had looked at the material 13 and indicated that having done so and if I may say so 14 with your, probably in this room, unrivaled experience 15 of looking at documents to see whether they may have 16 a bearing on issues that arise in particular 17 proceedings, but if you or Mr Ferguson between you have 18 done that and indicated that there was nothing that 19 added to anything that we had got in the report for the 20 issues that arise in this inquest, then plainly that 21 would have, on the face of it, a very significant 22 bearing indeed on the question of whether I would be 23 minded to exercise schedule 5 powers which are cast in 24 discretionary terms to order material to myself which 25 you told me, having looked at it, added nothing to what</p> <p style="text-align: center;">Page 127</p>
<p>1 Q. At that meeting, the IMT meeting where Mr Morgan was 2 there to discuss security issues and provide 3 information, did he indicate to those assembled at that 4 meeting that he had any different or particular concerns 5 about the control of security? 6 A. Not that I recall, no. 7 MR POPAT: Thank you. 8 THE CORONER: Thank you. Anyone else? 9 MR LAIDLAW: No, thank you. 10 THE CORONER: Thank you very much indeed. Very grateful. 11 (The witness withdrew) 12 THE CORONER: Mr Laidlaw, can I just come back in an effort, 13 I hope, to help just to the question we were talking 14 about earlier. 15 MR LAIDLAW: Yes. 16 THE CORONER: I wasn't able to look and I appreciate, as you 17 said I have not seen it, but there are plenty raised in 18 those documents and I do see that now having looked 19 at -- can I just say two things which -- because plainly 20 what one wants to do is to achieve a rapid solution to 21 this. 22 MR LAIDLAW: Absolutely. 23 THE CORONER: Can I just say two things. Obviously we all 24 have the Statoil report so that is the starting point. 25 In a document that Mr Ferguson put in he said this, that</p> <p style="text-align: center;">Page 126</p>	<p>1 we have in a substantial report. So that's one 2 possibility I would be grateful if you would consider. 3 MR LAIDLAW: Yes. 4 THE CORONER: Can I just mention the second? 5 MR LAIDLAW: Of course. 6 THE CORONER: And neither requires a response but it is just 7 this: if the material were on the other hand made 8 available to me as a consequence of your participation 9 as an interested person, that could on one view of the 10 terms of the undertaking satisfy it and again, it hardly 11 needs saying but if it came to me, as it were, if you 12 didn't do this exercise but if it came to me as I say 13 pursuant to your participation as an interested person, 14 on the face of it that might satisfy the undertaking and 15 equally you know that if anything in that material 16 doesn't bear on the issues here or is merely repetitive 17 of what we have got already, then plainly I am not going 18 to say that it should go any further. 19 Can I just leave those two possibilities with you 20 against the background that I know, so far as you are 21 concerned the position is. What we are all anxious to 22 do is to get hold of any material which we haven't 23 otherwise seen which may have a bearing on these 24 inquests and it has to be said under some pressure of 25 time. Entirely, I was going to say my fault, it wasn't</p> <p style="text-align: center;">Page 128</p>

<p>1 really, but because I came into this we lost a week and 2 although these questions which have come in the 3 documents are very interesting if there is actually 4 a much simpler resolution by either of those routes then 5 we can just get on with it and the families will, if 6 there is anything there, they'll know what it is. 7 That is really what I want to get to. 8 MR LAIDLAW: Those are plainly perfectly sensible and 9 reasonable requests I may say so and you have my 10 assurance that I'll raise them with my client. 11 Could I just say just a couple of things by way of 12 background? 13 THE CORONER: Yes, of course. 14 MR LAIDLAW: Just so that both you, sir, and the families 15 can have an understanding of the sort of challenges that 16 these requests give rise to. And nothing which has 17 occurred is your fault of course. This report, people 18 may not appreciate, was in its draft form provided to 19 your predecessor, so to Senior Coroner Schofield and 20 also to the police, as you would expect, to make sure 21 there was nothing within that because it was due to be 22 published which would cut across the coronial 23 investigation or indeed the police investigation. 24 It is then published in September of last year and 25 nobody until my learned friend on 19 September has made</p> <p style="text-align: center;">Page 129</p>	<p>1 THE CORONER: It certainly might be that, for example, the 2 question of letters from me being passed on, were the 3 position this, that you looked at the material and took 4 the view that there was only one person who had 5 anything, in which case the likelihood is I am simply 6 going to write one letter and ask you please if you 7 would pass that on. 8 MR LAIDLAW: I see the obvious sense in all of that. 9 I really do and I assure both you and the families. 10 THE CORONER: I am very grateful and I repeat having seen 11 those documents only briefly I appreciate that there is 12 some complexity to it. 13 MR LAIDLAW: Thank you, that was all I wanted to say. 14 THE CORONER: All right. 15 MR PERFECT: Can I just briefly, has there been any movement 16 or change or any update on the attendance of Mr Barry 17 Shaw? 18 THE CORONER: No, there hasn't. At the moment, I don't know 19 if it has filtered in, I am certainly minded Mr Popat's 20 proposal that no final decision was made until the other 21 witnesses have been heard seems to me to be a sensible 22 one. I think I may have got -- but it may be it is 23 still on my to do list, I had certainly got to the point 24 where it did seem to me there was merit in a statement 25 being taken but --</p> <p style="text-align: center;">Page 131</p>
<p>1 any request of Statoil for any material. 2 As far as the extant requests are concerned, dealing 3 firstly again with your request that Statoil, as it 4 were, be a conduit for a request from yourself that is 5 being given consideration by senior executives in the 6 ASA part of the organisation and I hope that I will be 7 able to indicate what their position is during the 8 course of tomorrow. As far as the balance of the new 9 request which you find and you have seen today -- 10 THE CORONER: I have to say, I have not, as it were, 11 mentally listed those and if I may just say, when 12 I first raised the matter with you I had in mind that it 13 was in a much narrower compass which is why I have come 14 back to it and as you have said it is more complicated. 15 MR LAIDLAW: Neither have I had a chance to really assess 16 them but they are plainly wide ranging. They give rise 17 to enormous challenges against the urgency which we have 18 to get through if it is possible or cut through if it is 19 possible these problems and there are considerable 20 challenges there. 21 But yes, I will certainly take back those two 22 requests and try and get an answer to them quickly and 23 we will obviously look to your powers and give you our 24 response by that deadline that you fixed at 2 o'clock on 25 Friday.</p> <p style="text-align: center;">Page 130</p>	<p>1 MS DOLAN: I haven't acted on it. 2 THE CORONER: So my current thinking is that no final 3 decision will be made so far as he is concerned until 4 two things have happened. One is that the other 5 witnesses, we have heard from them, as Mr Popat 6 suggested, and secondly, that a statement has been taken 7 from Mr Shaw so that I can at the end of the day look at 8 that on the one hand and the other evidence which 9 emerges on the other and if he is not going to add 10 anything to it then there we are. 11 MR PERFECT: I am grateful. 12 MR POPAT: Just so I understand is that proposal to obtain 13 a statement something which has been actioned through 14 your offices or is that something that is expected to be 15 done differently? 16 MS DOLAN: Sir. 17 THE CORONER: I have only just recently, very recently 18 communicated to Ms Dolan that being my, as it were, 19 broad view of the way we take the matter forward. But 20 the fine detail of that I will discuss with her and we 21 will obviously let you know. 22 There we are. I am glad it is not quite as late as 23 last night and I do apologise as I am sure it caused 24 a great deal of inconvenience but we just had to get 25 through the day's witnesses. Tomorrow I can't start</p> <p style="text-align: center;">Page 132</p>

1	until 11.15. So it is a slightly later start.	1	
2	Thank you, so 11.15 tomorrow.	2	Questions from MR SHARGHY114
3	(5.25 pm)	3	
4	(The inquest adjourned until the following day at 11.15 am)	4	Questions from MR POPAT120
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