

<p>1 Tuesday, 30 October 2014  2 (10.00 am)  3 (Proceedings delayed)  4 (10.10 am)  5 THE CORONER: Mr Ferguson, can I just raise the question of  6 the Statoil response which I dare say will come as  7 disappointing.  8 MR FERGUSON: Yes.  9 THE CORONER: I am bound to say that speaking for myself it  10 seems to me it proceeds upon a misapprehension because  11 you very helpfully, I am grateful to you, set out at the  12 top of the second page of your document the terms of the  13 undertaking that the company gave, but it seems to me it  14 misses out what is the unspoken part of that which is  15 assuming you don't consent then the position is this.  16 They are not seeking to forbid by that undertaking  17 anybody who wants to provide the information I assume to  18 do so, are they?  19 MR FERGUSON: Indeed not. And I --  20 THE CORONER: So what this really means is assuming you  21 don't consent the summary will not be disclosed outside  22 of the investigation team and so it seems to me this  23 isn't -- although it says these are the reasons for  24 feeling unable to comply with my request, it doesn't  25 seem to me it is that at all. It is a misunderstanding,</p> <p style="text-align: center;">Page 1</p>	<p>1 were seen but would there be any difficulty about simply  2 forwarding on without telling us that if we were to  3 draft a generic letter would there be any difficulty  4 about forwarding that on at our request?  5 MR FERGUSON: May I take instructions upon that?  6 THE CORONER: That would look almost obstructive if there  7 was -- that is not coming from the company. It is  8 simply me seeking to -- they can do what they like with  9 it when they get it but I find it very difficult to see  10 why that couldn't be done without looking extremely  11 awkward. Can I leave that with you, because that is one  12 possibility, that if we draft a letter that you forward  13 that on to those concerned. But I will certainly leave  14 that with you.  15 The other thing is I think it would help -- I don't  16 think your document expresses a view, but raises the  17 question about a Norwegian company, material that is in  18 Norway. If I was to say, because I think we will need  19 to move this on, if I was to say by Wednesday morning  20 would that be convenient to everybody, just to provide  21 anything in writing that anybody wants to say about the  22 power to order this material in the particular  23 circumstances? If that causes difficulty say so but  24 otherwise I think just because of the time pressure if  25 I was to say, please by Wednesday morning, then we can</p> <p style="text-align: center;">Page 3</p>
<p>1 isn't it, to my mind?  2 MR FERGUSON: I understand with respect, sir, your point in  3 that regard but having considered the position carefully  4 and the particular circumstances in which the evidence  5 was received there is a concern which, if permitted to,  6 I will articulate in more detail once all the  7 submissions are received. That having given such  8 undertakings for the investigation committee then to  9 turn round, in particular in relation to employees, and  10 be seen to be making a request which was not anticipated  11 nor in the spirit in which the interviews took place,  12 might be seen to be applying pressure in some way.  13 Now, I know you chose your words very carefully  14 indeed in ensuring that the message to be sent if  15 messages indeed were to be sent came from you and made  16 it clear that it was you and the family, interested  17 persons, who sought this information and not Statoil.  18 But nonetheless that sensitivity arises and I am very  19 sorry if that appears to be obstructive or  20 uncooperative. But after careful consideration of this  21 broad request for disclosure that is the stance that is  22 taken by those who instruct me.  23 THE CORONER: Is there any difficulty about -- I appreciate  24 that on this basis not only would you voluntarily  25 provide either the information or the names of those who</p> <p style="text-align: center;">Page 2</p>	<p>1 pursue that angle. I am very grateful, thank you.  2 MR FERGUSON: May I ask you to go a little further perhaps  3 and that is if there are other interested persons who  4 would seek to make disclosure requests of or through you  5 of Statoil in the way that Ms Gollop has done in some  6 detail, may I ask that they all be dealt with by that  7 time as well, so that we can deal with this in one fell  8 swoop?  9 THE CORONER: Yes, that is a good idea. I am very grateful.  10 We will do that too, thank you.  11 Right.  12 MS GOLLOP: Sorry, to interrupt.  13 THE CORONER: Not at all.  14 MS GOLLOP: I made a detailed request yesterday and one of  15 the things that I asked if it would be possible to do  16 would be to separate out because I understand there are  17 particular sensitivities with employees that don't  18 relate to those who aren't employees, for example, those  19 who are asked to assist the investigation in the  20 capacity of expert. It is a different position from  21 those who are witnesses.  22 I was unclear whether the 136 witness summaries were  23 all summaries of discussions with employees or a mixture  24 of those employees and not employees. I wonder if it  25 would be helpful if at all possible to do so, to have</p> <p style="text-align: center;">Page 4</p>

<p>1 that information before me before the submissions                  2 because the submissions might be slightly different.                  3 I understand that slightly different undertakings or                  4 documents were signed by those who weren't employees                  5 than those who were employees. It may not be crucial to                  6 submissions but it would just help to -- because there                  7 may be different categories of request I suspect.                  8 THE CORONER: No, I understand. I appreciate it is                  9 difficult, Mr Ferguson, because there is a lot going on                  10 but if it was possible at least, and if it isn't then                  11 someone can explain why, but if it were possible if                  12 there is a different kind of undertaking that is being                  13 given, particularly in the circumstances where the terms                  14 of it is relied on, if it were possible to circulate                  15 anything different that went to employees or                  16 nonemployees in the course of the day I know that would                  17 help everybody. All right, thank you very much.                  18 So do we have Mr Fitzpatrick to return.                  19 MR ANTHONY JOSEPH FITZPATRICK (recalled)                  20 THE CORONER: Thank you very much for coming back. You are                  21 still bound by the terms of the oath or the affirmation                  22 that you took yesterday you understand.                  23 <b>A. I understand, sir.</b>                  24 <b>Questions from MR OWEN-THOMAS</b>                  25 <b>MR OWEN-THOMAS: Good morning, Mr Fitzpatrick, my name is</b>                  Page 5</p>	<p>1 <b>A. It did initially when the contract was first provided</b>                  2 <b>but our role changed, as you are aware in July 2012.</b>                  3 Q. I am aware of that. Putting that to one side, does the                  4 remainder of this job description accurately reflect the                  5 role you were performing in January 2013?                  6 <b>A. Yes, yes.</b>                  7 Q. Described as a key liaison role, the 7th bullet point                  8 "manage proactively, set up and lead liaison meetings                  9 with all Algerian authorities ..."                  10 Do you see that?                  11 <b>A. I do.</b>                  12 Q. And that you agree, do you, was a key part of your role                  13 in January 2013?                  14 <b>A. No, it wasn't in January 2013, no. As you are aware</b>                  15 <b>this role had gone over and we had been specifically</b>                  16 <b>instructed by Sonatrach not to liaise with the military.</b>                  17 Q. My understanding of the evidence you gave last week is                  18 that nevertheless you maintained --                  19 <b>A. Direct contact with the captain on site.</b>                  20 Q. Direct contact with the military. Is that not right?                  21 <b>A. It was with the Gendarme on site.</b>                  22 Q. Just the Gendarmes?                  23 <b>A. Yes.</b>                  24 Q. Did you see it as any part of your function to assess                  25 the capability and function of the military, not the                  Page 7</p>
<p>1 <b>Owen-Thomas and I ask questions on behalf of</b>                  2 <b>David Green, the father of Stephen Green. Can I ask you</b>                  3 <b>first of all you should either in front of you or it can</b>                  4 <b>be handed to you a copy of a witness statement and its</b>                  5 <b>exhibits of Bill Johnston. It will either be on the</b>                  6 <b>spine of the folder or someone will hand it to you if it</b>                  7 <b>is not there. Bill Johnston's statement and exhibits.</b>                  8 <b>Could I ask you to turn to page 20 of those</b>                  9 <b>exhibits. Your witness statement first. That should be</b>                  10 <b>a contract for the provision of liaison services?</b>                  11 <b>A. That's correct.</b>                  12 Q. Is this a document you are familiar with?                  13 <b>A. No.</b>                  14 Q. Turn to page 45, hopefully you will be familiar with                  15 this.                  16 <b>A. Yes.</b>                  17 Q. This I think is your job description?                  18 <b>A. It was, well let me have a look through it.</b>                  19 Q. It was?                  20 <b>A. It was at the time.</b>                  21 Q. In January 2013?                  22 <b>A. Mmm.</b>                  23 Q. Just let me know when you have had a chance to look                  24 through that. (Pause) So does that properly encompass                  25 the job that you were doing?                  Page 6</p>	<p>1 Gendarmes, the wider military?                  2 <b>A. No. We had no contact with the wider military.</b>                  3 Q. So the JV could get no information from you as to the                  4 suitability of the military to protect the military                  5 zone?                  6 <b>A. But you cannot audit the Algerian military. No one can</b>                  7 <b>audit or inspect the Algerian military.</b>                  8 Q. So the JV got no information from you or as far as you                  9 are aware the liaison team about the effectiveness of                  10 the Algerian military?                  11 <b>A. No, that came from the Algerian government direct.</b>                  12 THE CORONER: And that would have been the case before and                  13 after July 2012?                  14 <b>A. Yes, yes.</b>                  15 <b>MR OWEN-THOMAS: Did you nevertheless seek to form a view in</b>                  16 <b>your own mind as to the effectiveness, capability</b>                  17 <b>discipline, organisation of the Algerian military?</b>                  18 <b>A. Well we do obviously when we're working with them on</b>                  19 <b>a daily basis.</b>                  20 Q. Some informal assessment, is that fair to say?                  21 <b>A. It is my observations. It is not an informal</b>                  22 <b>assessment. It is an observation.</b>                  23 Q. Can I ask you, please, to turn in bundle 1, I think it                  24 is the green bundle, the very first bundle of the core                  25 bundle and to page 90.                  Page 8</p>

<p>1 <b>A. Page 90 or tab?</b>  2 Q. Page 90, core bundle 1, I think it is green. It is  3 green I am told. Tab 11. I would like you to very  4 briefly look at this document. I understand you looked  5 at it last week. It is a document you recognise?  6 <b>A. It is. It is the JV security management plan. That is</b>  7 <b>generated by the Algerian liaison manager with input</b>  8 <b>from the OLSs on site, yes.</b>  9 Q. We know from page 93, that is internal page 4 of that  10 document, that one of the major security threats  11 identified was that of a terrorist attack?  12 <b>A. That's right.</b>  13 Q. What I would like to do is ask you some questions about  14 how you assessed that threat and the capability of  15 people to carry out that threat.  16 <b>A. I am afraid I didn't draw up this document.</b>  17 Q. No, but did it ever cross your mind as to how easy or  18 otherwise it might be for a terrorist to attack the  19 In Amenas site?  20 <b>A. It is very difficult to put yourself in the minds of an</b>  21 <b>Islamic terrorist and their raison detre and the reason</b>  22 <b>why they should target western interests and I don't</b>  23 <b>think we should try to do that.</b>  24 Q. Did you see it as any part of your role to assess the  25 likelihood and capability of a terrorist attack on the  Page 9</p>	<p>1 interests?  2 <b>A. Well they made a formal announcement in 2006, yes, when</b>  3 <b>the GSPC aligned themselves with Al Qaeda in the Islamic</b>  4 <b>Maghreb.</b>  5 Q. So no question of that, they were motivated to do so?  6 <b>A. That is also the information we received from the FCO</b>  7 <b>and the US embassy.</b>  8 Q. It was your assessment, was it, that they were capable  9 of carrying out that attack, they had the resources, the  10 weaponry?  11 <b>A. No, I wouldn't say it was my assessment that they were</b>  12 <b>capable of carrying out such an attack, no.</b>  13 Q. Was it your assessment that they were incapable of  14 carrying out an attack?  15 <b>A. When I generated the JV task risk assessment with the</b>  16 <b>team on site it was basically the vulnerabilities of the</b>  17 <b>site and the possible attack that would take place at</b>  18 <b>the site. Not the feasibility of an attack or, you</b>  19 <b>know, or the type of attack that would arrive, the</b>  20 <b>strength of the attack.</b>  21 Q. That almost seems to assume that an attack is  22 inevitable?  23 <b>A. Like -- again, we cannot put ourselves in the mind of an</b>  24 <b>Islamic terrorist, you know. There had been regular</b>  25 <b>attacks, as you are aware, throughout the country so</b>  Page 11</p>
<p>1 In Amenas plant?  2 <b>A. Yes, we carried out regular JV task risk assessments if</b>  3 <b>that is what you are referring to.</b>  4 THE CORONER: I think what you are being asked about is not  5 so much why anybody would do such a thing but in the  6 event that somebody did, did you think about the ways  7 they might do it and --  8 <b>A. Yes, we did.</b>  9 <b>MR OWEN-THOMAS: I know you spent a long time in the</b>  10 <b>military. Would you agree with me that in assessing</b>  11 <b>a threat you need to look at motivation, capability,</b>  12 <b>resources?</b>  13 <b>A. Mmm.</b>  14 Q. And see whether or not the threat is motivated to carry  15 out an attack, has the capability to do so, and that  16 forms part of how you assess that risk?  17 <b>A. That's correct.</b>  18 Q. And is that what you did --  19 <b>A. Yes.</b>  20 Q. -- with respect?  21 <b>A. Yes.</b>  22 Q. Let's think about motivation first of all. That would  23 be quite easy. Before January 2013 it was evident to  24 you that the sort of terrorists who might be operating  25 in and around Algeria were motivated to attack western  Page 10</p>	<p>1 <b>basically the risk is there. The threat is real and it</b>  2 <b>was there.</b>  3 Q. Well, if the threat is real, then doesn't that mean the  4 component parts of the threat, the motivation and  5 capability, are present in your mind?  6 <b>A. Possibly.</b>  7 Q. You have told us about the terrain between the Libyan  8 border and In Amenas. You have told us about the  9 ability to drive, as far as you are aware, and you have  10 told us about the capabilities of drivers in the desert  11 being able to negotiate this difficult terrain. In  12 terms of -- ignore for a moment military intervention,  13 just in terms of pure physical ability, it was quite  14 straightforward for people in 4 by 4s to travel quite  15 quickly within a day from the Libyan border to  16 In Amenas, wasn't it?  17 <b>A. Yes, but as we said, as I said on the 24th, it was</b>  18 <b>conceivable that this could happen but with the layers,</b>  19 <b>the layers of Algerian force protection from the border</b>  20 <b>to In Amenas it shouldn't have happened. It shouldn't</b>  21 <b>have been possible.</b>  22 Q. I will come to how effective you deemed that protection  23 in a moment.  24 <b>A. The Algerian government.</b>  25 Q. But setting that aside it was possible they could quite  Page 12</p>

1 easily navigate the terrain?  
 2 **A. Yes, certainly.**  
 3 Q. And they could do so, couldn't they, in a relatively  
 4 covert way if they went overnight?  
 5 **A. Covert, it's -- there are high dunes, there's extensive**  
 6 **plateaus, flat plateaus. So I don't know if there was**  
 7 **satellite imagery. I know that the Algerian government**  
 8 **were using regular helicopter gunships with infrared**  
 9 **measures patrolling the border.**  
 10 Q. So let's turn then to look at your assessment of this  
 11 first layer of protection, the Algerian military.  
 12 I take it from your answers earlier you weren't aware of  
 13 how many military were patrolling?  
 14 **A. The Algerian government made two official announcements,**  
 15 **basically saying that during the Libyan conflict they**  
 16 **were reinforcing the eastern borders between Libya and**  
 17 **Tunisia and the numbers were between 5,000 and 12,000**  
 18 **troops. Then the Algerian government made another**  
 19 **announcement saying they secured the southern borders**  
 20 **with Mali with an additional 5,000 I believe as well in**  
 21 **the southern regions.**  
 22 Q. Did you have any idea of how wide an area those 12,000  
 23 troops were patrolling?  
 24 **A. This information wasn't disclosed to anyone.**  
 25 Q. Did you ask for it?

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1 **A. Yes, of course. You do ask. Well, our main point of**  
 2 **contact on site is with the Gendarme commander and you**  
 3 **will ask him basically as much as you can without**  
 4 **seeking intelligence on the Algerian Armed Forces, which**  
 5 **is severely frowned upon obviously. We were always**  
 6 **assured that we worked in a very, very secure area.**  
 7 Q. I was going to ask you, is it right then you have no  
 8 idea of the order of battle of the Algerian military  
 9 between In Amenas and Libyan border?  
 10 **A. Yes, I do.**  
 11 Q. You do?  
 12 **A. The border was --**  
 13 Q. Can you give me a brief understanding of it?  
 14 **A. -- comprised basically of the GGF, which is the**  
 15 **Gendarmerie Garde Frontier. So they are a sort of**  
 16 **military type of Gendarme. They secure the border**  
 17 **itself and then inland from that you would then have**  
 18 **the ANP, the Army National Populaire, which is comprised**  
 19 **of infantry battalions, tank battalions and artillery**  
 20 **obviously. As well as the Air Force with helicopter**  
 21 **gunships and fighter jets.**  
 22 Q. Would an Algerian Battalion be an equivalent --  
 23 **A. Size? Yes.**  
 24 Q. 600 men roughly?  
 25 **A. Yes.**

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1 Q. Do you know how many battalions there were?  
 2 **A. No, we don't. That's more information that is not**  
 3 **disclosed. That's confidential.**  
 4 Q. What about the equipment available to them? Did you  
 5 have any idea -- you have mentioned earlier about the  
 6 helicopters with infrared cameras?  
 7 **A. Yes.**  
 8 Q. Were you aware of any other equipment they had that  
 9 would help detect such an attack, night vision, thermal  
 10 imaging?  
 11 **A. All the troops are equipped with night vision goggles,**  
 12 **thermal imaging et cetera. Indeed the Gendarmes at**  
 13 **Tigantourine were also equipped with that equipment.**  
 14 Q. Then obviously all these measures are only effective if  
 15 there are patrols in place and being carried out?  
 16 **A. That's correct.**  
 17 Q. Did you get a sense as to the extent and nature of the  
 18 patrolling that was carried out in the military zone?  
 19 **A. No, we weren't obviously authorised to audit or to**  
 20 **assess the military on the ground.**  
 21 Q. So if asked the best you could say is: from what they  
 22 tell us they're well equipped, there's plenty of them  
 23 and if they do their job properly --  
 24 **A. It was an official announcement from the Algerian**  
 25 **government saying that they had secured the borders and**

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1 **the official numbers came from the Algerian government**  
 2 **statements.**  
 3 Q. Just move to the Gendarmes though now. I think you told  
 4 us last week that you had regular meetings with  
 5 Captain Hocine?  
 6 **A. Yes, we did.**  
 7 Q. Did you say every day?  
 8 **A. Contact every day except the Saturday where he was at**  
 9 **home basically. Then he would be relieved by his senior**  
 10 **lieutenant.**  
 11 Q. Again, can I ask you about the order of battle of the  
 12 Gendarmes. You have explained to us I think the  
 13 squadron?  
 14 **A. It is -- it was a brigade. A squadron, sorry, yes.**  
 15 Q. I thought --  
 16 **A. A squadron, yes.**  
 17 Q. So headed by a captain?  
 18 **A. Yes.**  
 19 Q. I think we understand three lieutenants?  
 20 **A. Yes.**  
 21 Q. The structure beyond that, do you know anything about  
 22 the structure?  
 23 **A. It is a basic structure of where you would have senior**  
 24 **sergeants as 2ICs if you like because the lieutenants in**  
 25 **the Algerian system would be the platoon commander and**

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1 **the senior NCOs would be second in command, if you like,**  
 2 **of the platoon's, at platoon level.**  
 3 Q. And how many in a platoon?  
 4 **A. In a platoon? Approximately 30 there would be.**  
 5 Q. And three lieutenants three platoons?  
 6 **A. Three lieutenants -- well, the Gendarmerie Nationale**  
 7 **have a slightly different set up. Basically they also**  
 8 **have, if you like, escorts off-site, escorts that would**  
 9 **be directed and managed by a senior corporal for**  
 10 **instance.**  
 11 Q. But in terms of the numbers of Gendarmes?  
 12 **A. There were, it's not -- obviously it's not confidential**  
 13 **because it's noted everywhere but there were 160**  
 14 **Gendarmes on site.**  
 15 Q. Were you aware of that yourself?  
 16 **A. Yes.**  
 17 Q. You saw 160 people?  
 18 **A. Again, you cannot carry out a physical head count with**  
 19 **the Gendarmes but that was the logistic support we gave**  
 20 **them. That is what they requested.**  
 21 Q. Did you ever see the entire squadron formed up?  
 22 **A. We saw armed parades on occasions but not the full**  
 23 **squadron, no, because they have other duties obviously**  
 24 **to ensure the protection of the site. So they wouldn't**  
 25 **all parade at the same time.**

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1 Q. So again, is it fair to say then that you had no  
 2 independent means of corroborating this claim of 160  
 3 Gendarmes?  
 4 **A. No.**  
 5 Q. In terms of their kit and equipment, was that similar to  
 6 the military?  
 7 **A. It was similar to the military, yes.**  
 8 Q. Did they have night vision goggles?  
 9 **A. Yes they did.**  
 10 Q. Thermal imaging?  
 11 **A. I'm not sure about thermal imaging but they did have**  
 12 **night vision goggles.**  
 13 Q. Now, the patrols they carried out. I think from your  
 14 answers last week I understand there were two 12 hour  
 15 patrols every day?  
 16 **A. Yes, there was 24 hour protection.**  
 17 Q. With shift change at 4.30?  
 18 **A. 4.30, 5.30, between those hours, yes.**  
 19 Q. How many Gendarmes out on patrol during the night?  
 20 **A. During the night there were five vehicles, three**  
 21 **Gendarmes per vehicle so 15 Gendarmes. That's the --**  
 22 **they are the vehicles that we provide. They have their**  
 23 **own, obviously, vehicles and they can carry out patrols**  
 24 **with their own vehicles and their own personnel whenever**  
 25 **they require but they don't report to us about this.**

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1 Q. So as far as you are aware the work they did in  
 2 protecting the site should anyone breach through the  
 3 military zone was these five vehicles each with three  
 4 Gendarmes?  
 5 **A. Five vehicles with each Gendarme. You also had the VCP**  
 6 **at La Recule that was manned with Gendarmes as well,**  
 7 **night and day.**  
 8 Q. And they came from?  
 9 THE CORONER: I am not sure he had quite finished. Had you  
 10 finished or not? Were you about to add something?  
 11 **A. Yes.**  
 12 THE CORONER: You carry on.  
 13 MR OWEN-THOMAS: Yes, you had finished?  
 14 **A. No, the VCP I was saying at La Recule also had Gendarmes**  
 15 **reinforced. They reinforced the permanent access road**  
 16 **as well. So they were on standby.**  
 17 **MR OWEN-THOMAS: Did they come out of the 160 complement**  
 18 **from the Gendarme camp?**  
 19 **A. Yes.**  
 20 Q. In terms of the area in which these five vehicles  
 21 patrolled, I understand from you and from others,  
 22 looking at, it is 2 to 3-kilometres either side of the  
 23 road between the BdV and the CPF?  
 24 **A. That's correct.**  
 25 Q. Did you have any sense -- probably about 30 to 40 square

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1 kilometres, does that seem about right?  
 2 **A. It seems large but I haven't calculated the surface**  
 3 **area. I know for a fact they did station themselves as**  
 4 **well during the night at VCP1, VCP2 because the guards**  
 5 **would report this but that's something else.**  
 6 Q. Some of the vehicles that were out on patrol?  
 7 **A. The patrol would pass by there, VCP1 and VCP2.**  
 8 Q. So if there were one vehicle at each checkpoint?  
 9 **A. They very rarely split the teams up. I don't think they**  
 10 **did split the teams up to be honest.**  
 11 Q. So all five vehicles would go out together?  
 12 **A. To patrol.**  
 13 Q. And patrol as one unit?  
 14 **A. Mmm.**  
 15 Q. Did you see it as part of your function to report back  
 16 to the JV as to the effectiveness of those patrols and  
 17 their ability to prevent an attack taking place at the  
 18 site?  
 19 **A. Well, we weren't allowed out after the 19.30 curfew so**  
 20 **there was a chef d'equipe who was part of the SSI team**  
 21 **who carried out regular night patrols.**  
 22 Q. As you say he was an Algerian national?  
 23 **A. He was an Algerian national.**  
 24 Q. Employed by SSI?  
 25 **A. Yes.**

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<p>1 Q. Who accompanied the Gendarmes?</p> <p>2 <b>A. To carry out his own external patrols as well around the</b></p> <p>3 <b>main camps around the area and to control obviously the</b></p> <p>4 <b>military, the Gendarmes, are out in the zone and</b></p> <p>5 <b>carrying out their duties. This has to be done very,</b></p> <p>6 <b>very discreetly obviously because if the Gendarmes even</b></p> <p>7 <b>thought that they were being spied upon or controlled</b></p> <p>8 <b>there would be serious repercussions for the JV.</b></p> <p>9 Q. You anticipate my next question. My understanding is</p> <p>10 that the Gendarmes were fairly intimidating as a force?</p> <p>11 <b>A. It was quite difficult to work with the Gendarmes, yes.</b></p> <p>12 Q. And would have been fairly intimidating for the ASI or</p> <p>13 the chef d'equipe that you mentioned? Reporting --</p> <p>14 <b>A. To be honest they're intimidating within Algeria, the</b></p> <p>15 <b>security forces.</b></p> <p>16 Q. Did the ASI or the team leader ever liaise with you</p> <p>17 directly?</p> <p>18 <b>A. No, after July, no, they didn't.</b></p> <p>19 Q. So you never got a report after that time, they are</p> <p>20 always patrolling or no, they're going to sit and play</p> <p>21 cards all night at VCP1 or --</p> <p>22 <b>A. Yes, obviously I would discuss with the ASI who was the</b></p> <p>23 <b>Sonatrach lead security manager and he would pass on</b></p> <p>24 <b>this type of information. Yes, the zone's being</b></p> <p>25 <b>patrolled, it's being protected et cetera.</b></p> <p style="text-align: center;">Page 21</p>	<p>1 Q. You were confident --</p> <p>2 <b>A. Prior to the attack, yes.</b></p> <p>3 Q. But you reported back the obvious limitations that you</p> <p>4 have no way of validating or verifying that?</p> <p>5 <b>A. Yes, and everyone's aware of that as well.</b></p> <p>6 Q. So I come to now the physical security of the BdV</p> <p>7 itself, the integrated camp itself. We have heard a lot</p> <p>8 about the layout of the camp and I think we have a good</p> <p>9 understanding now of the security measures that are in</p> <p>10 place. Did you see it as any part of your function to</p> <p>11 advise the JV as to the adequacy of those security</p> <p>12 measures?</p> <p>13 <b>A. No, we did advise and recommend on a number of</b></p> <p>14 <b>occasions.</b></p> <p>15 Q. And did you assess the security of the integrated camp</p> <p>16 and the CPF in light of the possibility of terrorists</p> <p>17 getting through those two outer rings?</p> <p>18 <b>A. Yes, we carried out regular risk assessments, yes, prior</b></p> <p>19 <b>to the ASI taking over.</b></p> <p>20 Q. And I think it is your evidence last week that you found</p> <p>21 a number of matters to be inadequate. Take, for example</p> <p>22 for example, the gates?</p> <p>23 <b>A. The gates, yes.</b></p> <p>24 Q. You considered them inadequate protection?</p> <p>25 <b>A. The gates were, I wouldn't say inadequate.</b></p> <p style="text-align: center;">Page 23</p>
<p>1 Q. And you have no way of validating or verifying that?</p> <p>2 <b>A. Unfortunately not, no except the word of the captain</b></p> <p>3 <b>obviously who I did meet with.</b></p> <p>4 Q. Did he go out at night on patrol?</p> <p>5 <b>A. The captain?</b></p> <p>6 Q. Yes.</p> <p>7 <b>A. He would have done. He wouldn't tell me obviously what</b></p> <p>8 <b>he does or what his lieutenants do but they do carry out</b></p> <p>9 <b>their own patrols as well.</b></p> <p>10 Q. Do you know who was on patrol with the Gendarmes the</p> <p>11 night of the 15/16th?</p> <p>12 <b>A. I don't, I am afraid but that information is recorded</b></p> <p>13 <b>I assure you. There are journey management plans made</b></p> <p>14 <b>up, Ordre de Missions are distributed so you will be</b></p> <p>15 <b>able to gain that information from the JV.</b></p> <p>16 Q. From the JV did you say?</p> <p>17 <b>A. Yes, from the JV. Well, from the ASI who was in place.</b></p> <p>18 Q. Have you made your own enquiries since?</p> <p>19 <b>A. I haven't been allowed back in country, or well, allowed</b></p> <p>20 <b>back in, I haven't returned to site since the incident.</b></p> <p>21 Q. So in terms of whether or not these patrols were being</p> <p>22 carried out, whether or not all five vehicles were going</p> <p>23 out and patrolling, you trusted the word of</p> <p>24 Captain Hocine and those that you spoke to?</p> <p>25 <b>A. Well --</b></p> <p style="text-align: center;">Page 22</p>	<p>1 Q. Could have been better?</p> <p>2 <b>A. Yes, of course.</b></p> <p>3 Q. And you recommended that they be improved?</p> <p>4 <b>A. Yes, this was recommended through my line manager,</b></p> <p>5 <b>obviously.</b></p> <p>6 Q. And that was something that was intended to take place</p> <p>7 but didn't?</p> <p>8 <b>A. Yes, it was, yes.</b></p> <p>9 Q. Let me just ask you, I think we know this but there was</p> <p>10 no fence all the way around the site, was there, the</p> <p>11 CPF?</p> <p>12 <b>A. No, no.</b></p> <p>13 Q. Did you consider placing one?</p> <p>14 <b>A. No, we didn't. Principally because of the military</b></p> <p>15 <b>protection zone that was in 24 -- that was in place</b></p> <p>16 <b>24 hours a day and we were assured that we did work and</b></p> <p>17 <b>live in a secure zone.</b></p> <p>18 <b>MR OWEN-THOMAS: Thank you, Mr Fitzpatrick, that is all</b></p> <p>19 <b>I have to ask.</b></p> <p>20 <b>A. Thank you.</b></p> <p>21 <b>Questions from MS GOLLOP</b></p> <p>22 <b>MS GOLLOP: Hello, Mr Fitzpatrick.</b></p> <p>23 <b>A. Good morning.</b></p> <p>24 Q. My name is Katie Gollop and I am asking questions on</p> <p>25 behalf of Belinda Green, the lady in the white who is</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 the widow of Stephen Green. 2 Just a few random things. The Statoil report. 3 I think you told us last time you gave evidence you have 4 seen it? 5 <b>A. Yes, I have read through the Statoil report, yes.</b> 6 Q. Were you interviewed for the purposes of that? 7 <b>A. Yes, we were.</b> 8 Q. When you say "we" who else was? 9 <b>A. Well, my CEO, Mike Lord, the manager; Gary Butt the</b> 10 <b>Algerian liaison manager.</b> 11 Q. Anybody else? 12 <b>A. Chris Rikuna.</b> 13 Q. Who is that? 14 <b>A. Tom Martin -- these are all expats who worked for the</b> 15 <b>JV.</b> 16 Q. Where did that interview take place? 17 <b>A. In Manchester.</b> 18 Q. Were you asked to sign an undertaking or 19 a confidentiality agreement at the end of that 20 interview? 21 <b>A. I can't remember to be honest. We did have legal team</b> 22 <b>representation but I'm not sure.</b> 23 Q. Sir, a question arises as to whether this witness might 24 in time be prepared to let us to see the record of what 25 he said. I think it is unfair to ask him this while he</p> <p style="text-align: center;">Page 25</p>	<p>1 <b>that all the zones are protected correctly et cetera,</b> 2 <b>that security is in place.</b> 3 Q. I don't want to spend too long on this but because we 4 have so little information on this I think it would help 5 Mrs Green just to understand what impression you formed, 6 whether you were content with -- or you had confidence 7 in that gentleman and what he was doing, just tell us 8 a little bit about the meetings? 9 <b>A. Which gentleman?</b> 10 Q. The chef de sector. We have very little information 11 about -- 12 <b>A. Yes, I didn't meet him.</b> 13 Q. -- Liaison's interaction with the army as opposed to the 14 Gendarmerie, perhaps you could tell us? 15 <b>A. The interaction with the army itself was very limited</b> 16 <b>because we worked day-to-day with the Gendarmerie</b> 17 <b>basically. And in In Amenas town, with which we had</b> 18 <b>contacts obviously, we worked with the sous chef de</b> 19 <b>sector militaire, who was actually a Gendarme as well,</b> 20 <b>who was part of the GGF as I explained earlier, the</b> 21 <b>Gendarmerie Garde Frontier, so the infantry itself we</b> 22 <b>didn't have a great deal of liaison at the time with.</b> 23 Q. So is that no liaison at all? 24 <b>A. No liaison prior to the attack, no.</b> 25 Q. Were you aware of the meeting with Colonel Fata on</p> <p style="text-align: center;">Page 27</p>
<p>1 is in the witness box but perhaps some thought could be 2 given to that before he leaves? 3 THE CORONER: Yes, certainly. 4 MS GOLLOP: Thank you. Moving on to something else. There 5 has been reference by others and I think in some of the 6 witness statements to a gentleman called Colonel Fata 7 and a meeting with him in 2012. Did you attend the 8 meeting. 9 <b>A. No, I didn't.</b> 10 Q. Have you ever met him? 11 <b>A. No, I haven't met Colonel Fata, no.</b> 12 Q. Did you ever meet any of the military? 13 <b>A. Yes, we did. Prior to the handing over we did have</b> 14 <b>regular meetings with the sous chef sector in In Amenas,</b> 15 <b>the chef de sector when he came up from Illizi from time</b> 16 <b>to time. Customs officials at the airport. That type</b> 17 <b>of thing.</b> 18 Q. I am less interested in the airport security but 19 generally the chef de sector did you say? 20 <b>A. The chef de sector militaire, he is based in Illizi,</b> 21 <b>yes.</b> 22 Q. That would be in connection with the military as in army 23 rather than Gendarme protection? 24 <b>A. Yes, yes, that's correct. He works very closely with</b> 25 <b>the Wali, the governor of Illizi basically to ensure</b></p> <p style="text-align: center;">Page 26</p>	<p>1 the -- 2 <b>A. It is vague in my mind, but, yes.</b> 3 Q. You can't remember who went to that meeting? 4 <b>A. No, I can't, I am afraid.</b> 5 Q. I want to ask you just very briefly about the night 6 patrol. You talked about it a little bit more just now. 7 A few follow-up questions. You said a moment ago it was 8 quite difficult to work with the Gendarme. You know 9 what you mean but the rest of us listening don't. Can 10 you just be specific about what those difficulties were? 11 <b>A. I'm sure you are aware of the political, the internal</b> 12 <b>politics of Algeria?</b> 13 Q. Very little as it happens, perhaps you can just give us 14 your perception? 15 <b>A. Well, most of the -- I would say most of the decision</b> 16 <b>making is made by the military and so the government</b> 17 <b>though, there is a civilian government in place, it is</b> 18 <b>certainly influenced by the military. So Gendarmes as</b> 19 <b>well. They fall into line. The Gendarmes basically --</b> 20 <b>we can try and influence the Gendarmes, it is very</b> 21 <b>difficult. They will decide. They decide what measure</b> 22 <b>they need to put in place. What security they need to</b> 23 <b>put in place. What security is adequate et cetera</b> 24 <b>et cetera and we cannot influence that decision making.</b> 25 <b>So though we can work with them very closely we can only</b></p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 <b>work with what they give us and what they put in place.</b></p> <p>2 <b>What they deem adequate or sufficient at the time.</b></p> <p>3 Q. As I understand it, there was a mechanism for trying to</p> <p>4 influence or mould what the Gendarmes would offer and</p> <p>5 that was to report things up to your manager in</p> <p>6 Hassi Messaoud who would in turn talk to, for example,</p> <p>7 Mr Cobb, who would take it up to the next level of</p> <p>8 committee and it would go around in that way. Do you</p> <p>9 have experience of making a request that was escalated</p> <p>10 in that fashion and your request was acceded to or</p> <p>11 declined?</p> <p>12 <b>A. I do remember one occasion, it's very vague though</b></p> <p>13 <b>I can't go into much detail about it. It was basically</b></p> <p>14 <b>around the fact that the military were having problems</b></p> <p>15 <b>at the time of assuring all the escorts, all the</b></p> <p>16 <b>military escorts we required -- because individual</b></p> <p>17 <b>escorts were imposed by the Gendarmerie on the JV for</b></p> <p>18 <b>every expat departing on work for the CPF zone they</b></p> <p>19 <b>required an individual escort and obviously we were out</b></p> <p>20 <b>in the -- during the construction phase at the well</b></p> <p>21 <b>sites et cetera and it was very, very -- the workload</b></p> <p>22 <b>was very heavy. So basically the Gendarmes didn't have</b></p> <p>23 <b>sufficient troops to carry out all their functions, site</b></p> <p>24 <b>protection and individual escorts, so we requested</b></p> <p>25 <b>basically additional troops. And the Gendarmes at the</b></p> <p style="text-align: center;">Page 29</p>	<p>1 Q. I think that was a back-to-back function, was that</p> <p>2 right?</p> <p>3 <b>A. Yes, that's correct.</b></p> <p>4 Q. And you presumably knew the two ASIs who took over</p> <p>5 after --</p> <p>6 <b>A. Yes we did, yes.</b></p> <p>7 Q. And your assessment of them. Did they seem competent</p> <p>8 people?</p> <p>9 <b>A. Yes, they did.</b></p> <p>10 Q. And did their job properly not in a slightly lax fashion</p> <p>11 as some of the other civilian guards did?</p> <p>12 <b>A. They did work for us. They worked as OLCs on the rig</b></p> <p>13 <b>sites for a period of time back to back with an expat</b></p> <p>14 <b>OLC. And with good management and with good supervision</b></p> <p>15 <b>they performed admirably. Unfortunately once we lost</b></p> <p>16 <b>management of the team they became their own entity and</b></p> <p>17 <b>so it was quite difficult. The relationship became</b></p> <p>18 <b>strained certainly.</b></p> <p>19 Q. So that relationship became strained from around the</p> <p>20 time that Sonatrach took over the control?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. And so that had been happening for about 6 or 7 months</p> <p>23 prior to the attack. Is that right?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. So they were the ones who were seeking --</p> <p style="text-align: center;">Page 31</p>
<p>1 time says, well, this is not my position. It's your</p> <p>2 position to request the troops. Which it isn't</p> <p>3 obviously. It is theirs. It is the local commander who</p> <p>4 needs to provide sufficient troops to carry out the</p> <p>5 day-to-day activities of the JV. If not we'd never</p> <p>6 build anything basically or construct anything. And</p> <p>7 I think the reasoning was yes, we did pass it through to</p> <p>8 our line manager, through the general manager at the</p> <p>9 time at Tiguentourine, which was Mimoun Benghenima, and</p> <p>10 he refused basically the category that we would get</p> <p>11 involved in that and it was down to the Gendarmes</p> <p>12 themselves to organise.</p> <p>13 So though, yes, it sounds like you can go via the</p> <p>14 Wali, via Mark Cobb et cetera it is very difficult to</p> <p>15 circumvent the Gendarmes.</p> <p>16 Q. Did that influence your thinking when later you came to</p> <p>17 the feeling that you would like to see the guard towers</p> <p>18 manned and the Gendarme said no, and you thought well</p> <p>19 there's no point in even trying to change that?</p> <p>20 <b>A. Basically if the Gendarmes refused, the Gendarme</b></p> <p>21 <b>commander on site, no one will change his decision.</b></p> <p>22 Q. I just want to go back to some questions about what</p> <p>23 I think when you were in control was called the OLA of</p> <p>24 night patrol and then became the chef d'equipe?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 30</p>	<p>1 <b>A. Management.</b></p> <p>2 Q. Monitoring -- I think you said spying on, maybe that is</p> <p>3 not the right word. Maybe it is?</p> <p>4 <b>A. No, you can't, obviously not. Observing.</b></p> <p>5 Q. Observing?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. And how did that observation work in practice? You are</p> <p>8 following around five trucks with 13 heavily armed --</p> <p>9 <b>A. 15, yes.</b></p> <p>10 Q. -- men and?</p> <p>11 <b>A. You wouldn't follow them around. No.</b></p> <p>12 Q. Right.</p> <p>13 <b>A. There is a circuit of patrols the OLA or the chef</b></p> <p>14 <b>d'equipe needs to carry out during the night. They are</b></p> <p>15 <b>all different satellite camps if you like within the CPF</b></p> <p>16 <b>base. So there are national camps as well and the OLA</b></p> <p>17 <b>would visit these camps to make sure that security,</b></p> <p>18 <b>everything was fine, quiet, peaceful and on their tours</b></p> <p>19 <b>they would meet up. They would visit VCP1, VCP2, the</b></p> <p>20 <b>guards, and there would be patrols there as well</b></p> <p>21 <b>stationed there for 15 minutes and then they would move</b></p> <p>22 <b>off. So no, during the night you wouldn't follow a 15</b></p> <p>23 <b>man Gendarme patrol, no, it's too dangerous.</b></p> <p>24 Q. So just so I have this clear, the 15 man Gendarme patrol</p> <p>25 is going around outside the perimeter fence?</p> <p style="text-align: center;">Page 32</p>



<p>1 <b>A. Of course, yes.</b></p> <p>2 Q. And the OLA or chef d'equipe is going around -- is also</p> <p>3 outside the perimeter fence?</p> <p>4 <b>A. Yes, though expats are limited to a 19.30 to 5.30 curfew</b></p> <p>5 <b>the nationals weren't. So the nationals had free</b></p> <p>6 <b>movement within that protection zone all night.</b></p> <p>7 Q. So once you lost control of that OLA function you also</p> <p>8 have much less information about what's happening during</p> <p>9 the night?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. And I think you told us the documentation that would</p> <p>12 tell you who the OLA or the chef d'equipe was for that</p> <p>13 evening, that would presumably be held by Sonatrach?</p> <p>14 <b>A. Yes, yes.</b></p> <p>15 Q. Not the JV?</p> <p>16 <b>A. No, by the ASI who is a Sonatrach security manager.</b></p> <p>17 Q. And if Sonatrach choose not the share it with Statoil</p> <p>18 and BP you have no information at all?</p> <p>19 <b>A. I have no information I am afraid, no.</b></p> <p>20 Q. And you told us relations became strained?</p> <p>21 <b>A. They did become strained but it is relationship</b></p> <p>22 <b>building, isn't it? These people are -- though they</b></p> <p>23 <b>have an extensive experience they find themselves in</b></p> <p>24 <b>a senior management role, security management role in</b></p> <p>25 <b>direct contact with the lead security coordinator for</b></p> <p style="text-align: center;">Page 33</p>	<p>1 those?</p> <p>2 <b>A. I really can't comment. Collusion between the Gendarme</b></p> <p>3 <b>and the terrorists? I really can't comment on that.</b></p> <p>4 Q. So that seems unlikely?</p> <p>5 <b>A. I think so.</b></p> <p>6 Q. Does it just seem like total incompetence?</p> <p>7 <b>A. No, the question I raised is where were the night</b></p> <p>8 <b>patrol? Did they intervene? They may have intervened.</b></p> <p>9 <b>I don't know. This is the question. This is an answer.</b></p> <p>10 THE CORONER: As I understand what you are saying, the five</p> <p>11 vehicles, they all stick together, and so they may just</p> <p>12 simply -- by doing that you could just be in the wrong</p> <p>13 place --</p> <p>14 <b>A. If they were on the wrong side.</b></p> <p>15 THE CORONER: -- whereas obviously if you are in different</p> <p>16 places you increase your chances by five.</p> <p>17 <b>A. We just need to know where they were, did they</b></p> <p>18 <b>intervene, did they confront the attackers or -- I think</b></p> <p>19 <b>that would be a good question to ask.</b></p> <p>20 THE CORONER: But they could just have been in a completely</p> <p>21 different place if they are sticking together as five.</p> <p>22 <b>A. They may have been, yes.</b></p> <p>23 THE CORONER: It is possible, isn't it?</p> <p>24 <b>A. Yes.</b></p> <p>25 MS GOLLOP: Can I ask about that?</p> <p style="text-align: center;">Page 35</p>
<p>1 <b>Sonatrach in Algiers and it can, I suppose the pressure</b></p> <p>2 <b>can get to people, you know. Relationships -- to be</b></p> <p>3 <b>perfectly honest, the last two months and my line</b></p> <p>4 <b>manager's internal security review of that says</b></p> <p>5 <b>relationships were improving remarkably to what they had</b></p> <p>6 <b>been. So yes, relationships were fine. We were working</b></p> <p>7 <b>together. It was fine.</b></p> <p>8 Q. When you gave evidence on the last occasion you said</p> <p>9 that in your mind there were three questions that needed</p> <p>10 to be answered in connection with how the attack came to</p> <p>11 happen. And one of those was what happened to the night</p> <p>12 patrol and why didn't it spot the attackers?</p> <p>13 <b>A. I wasn't there and I didn't return back so I don't know</b></p> <p>14 <b>the answer to that question.</b></p> <p>15 THE CORONER: I think you are just being asked did you think</p> <p>16 that was an important question.</p> <p>17 <b>A. Yes, it was, yes.</b></p> <p>18 MS GOLLOP: Presumably, maybe I am trying to think through</p> <p>19 the possibilities in my mind and I quite possibly</p> <p>20 haven't imagined all of them. One of them is there was</p> <p>21 some collusion between the night patrol and the</p> <p>22 attackers and another is that they were totally</p> <p>23 incompetent. Another I suppose is that the night patrol</p> <p>24 simply didn't perform that night. There may be others</p> <p>25 but do you have a sense of which is the most likely of</p> <p style="text-align: center;">Page 34</p>	<p>1 <b>A. Though saying that, sir, the ambush on the VCP1 is over</b></p> <p>2 <b>a kilometre out from the BdV so I mean, that was intense</b></p> <p>3 <b>gunfire for a period of time I believe. So wherever</b></p> <p>4 <b>they were they would have returned to that location or</b></p> <p>5 <b>to protect the BdV or, you know, in time I suspect.</b></p> <p>6 MS GOLLOP: The thinking behind going round as a group of</p> <p>7 five vehicles, is it possible that it might have made</p> <p>8 more sense to spread out so that you are not, for</p> <p>9 example, at the southwest when it is being attacked from</p> <p>10 the northeast and you can't go get round in time?</p> <p>11 <b>A. Again, I can't comment on the military, the Gendarme</b></p> <p>12 <b>tactics for protecting the security.</b></p> <p>13 Q. Put it this way then: in your liaison function with all</p> <p>14 of your experience that you brought to bear and your</p> <p>15 advisory role to the JV as to whether the site was safe,</p> <p>16 did it seem to you safe to go round in one group rather</p> <p>17 than being able to take different points of the compass</p> <p>18 at the same time?</p> <p>19 <b>A. Different points of the compass at the same time would</b></p> <p>20 <b>be ideal but not individual patrol vehicles. You would</b></p> <p>21 <b>never leave a patrol vehicle individually. It would be</b></p> <p>22 <b>vulnerable to attack.</b></p> <p>23 Q. So it might have made sense, perhaps this was your</p> <p>24 thinking when you requested eight vehicles, to go round</p> <p>25 in four groups of 2?</p> <p style="text-align: center;">Page 36</p>

1 **A. Yes, it may have been.**  
 2 Q. That would have been safer, wouldn't it?  
 3 **A. I --**  
 4 Q. From an advisory point of view?  
 5 **A. From an advisory point of view it may have been safer.**  
 6 **It may have been more operational --**  
 7 Q. It is better than putting your eggs all in one basket,  
 8 isn't it?  
 9 **A. Yes.**  
 10 Q. I will ask you some questions about the quick reaction  
 11 force. Do you know how many of the 160 Gendarmes were  
 12 trained to do QRF duty?  
 13 **A. I believe they were all trained.**  
 14 Q. All?  
 15 **A. They all -- they were all on -- they took this duty over**  
 16 **I believe 24 hours.**  
 17 Q. And do you know how many QRF units were on duty at any  
 18 one time?  
 19 **A. Just the one QRF.**  
 20 Q. Do you know who the leaders of the units were?  
 21 **A. No, they were usually lieutenants.**  
 22 Q. And did they have anything that identified them, could  
 23 you tell who was on QRF duty at any one time? Different  
 24 uniform or different hat?  
 25 **A. No, the same uniform. They just remained in uniform for**  
 Page 37

1 **24 hours a day. They (inaudible) the weapons et cetera**  
 2 **so they were located in a separate accommodation area**  
 3 **from the rest of the troops so they weren't allowed to**  
 4 **mingle. They had their own cabins et cetera. Their own**  
 5 **accommodation block. And they were there with their**  
 6 **weapons and vehicles on standby 24 hours a day.**  
 7 Q. And this is what you observed or simply what you were  
 8 assured by Captain Hocine?  
 9 **A. No, I observed it because we, well the JV installed the**  
 10 **new accommodation block to house the QRF. This was**  
 11 **a later request that came from Gendarmes. They actually**  
 12 **said they were putting in place or they always had a QRF**  
 13 **but the QRF was always mixed in with other troops and so**  
 14 **basically you have QRF members who are in all different**  
 15 **rooms with their weapons in their rooms and not in the**  
 16 **armory and so the Gendarme commander believed, he wanted**  
 17 **a separate area so there would be no distractions for**  
 18 **the QRF so they could be ready outside to intervene at**  
 19 **any time basically.**  
 20 Q. To your knowledge in all your time at the In Amenas  
 21 facility had the QRF ever had to mobilise for a real  
 22 event?  
 23 **A. No, no.**  
 24 Q. Never?  
 25 **A. Not to my knowledge, no.**  
 Page 38

1 Q. So it had never actually been put to the test?  
 2 **A. Drills, yes, they carried out drills but a real alert?**  
 3 **No, not to my knowledge.**  
 4 Q. When they did a drill was it always that all of the unit  
 5 would go to one place?  
 6 **A. I only observed one drill.**  
 7 Q. You only observed one drill?  
 8 **A. One drill, yes.**  
 9 Q. Do you remember when you had that experience?  
 10 **A. It was first Q I think or the second Q of 2012 and it**  
 11 **was basically the captain announcing an alert at the BdV**  
 12 **and the QRF then, because I have line of sight from my**  
 13 **office with them but I was outside at the time, i was**  
 14 **expecting that the captain did on this occasion tell me**  
 15 **when it was going to happen and basically they mustered**  
 16 **outside. They mounted in their green and white Gendarme**  
 17 **vehicles and then came to the BdV and secured the**  
 18 **perimeter.**  
 19 Q. If they had done other drills before that you would have  
 20 been aware of it, wouldn't you?  
 21 **A. No, not necessarily. They have drills around their own**  
 22 **camp on a number of occasions. The ones that we were**  
 23 **made aware of very quickly is when they carried out**  
 24 **blank firing exercises without informing us and you**  
 25 **begin to hear blank firing rounds, gunfire et cetera.**  
 Page 39

1 Q. This was another of the questions that you thought would  
 2 be a good starting point in an investigation as to  
 3 whether it responded and there's some suggestion that it  
 4 might have taken as much as 25 minutes to actually  
 5 mobilise. Do you have a sense of any educated guesses  
 6 as to what might have happened?  
 7 **A. No, not at all.**  
 8 Q. Am I right in thinking you have had no contact with  
 9 Captain Hocine since the attack?  
 10 **A. No, I have had no contact with the captain since.**  
 11 Q. I want to ask you one more question about physical  
 12 security by which I mean fences, lighting, CCTV,  
 13 chicane, that sort of thing.  
 14 **A. Mmm.**  
 15 Q. You have been asked lots of questions about risk  
 16 assessment for an attack by terrorists in vehicles who  
 17 have actually broken through all of the outer layers and  
 18 they are at the gate. I want to imagine that scenario.  
 19 I just want to be clear in my mind because I have  
 20 sometimes been unclear as to what exactly your position  
 21 was.  
 22 You go back to say, for example, the last time you  
 23 were on site which I think was November 2012, is that  
 24 right?  
 25 **A. Yes, that's correct. One month prior to the attack.**  
 Page 40

<p>1 Q. Put yourself back in that position and imagine attackers 2 who have broken through the outer layers of security. 3 Was it your view or wasn't it that the physical security 4 was adequate to withstand or delay an armed assault? 5 <b>A. Well, obviously if you read the security management plan 6 you realise that we made some recommendations for the 7 outer perimeter fences et cetera because we didn't deem 8 them adequate at the time.</b> 9 Q. A few questions about the guardhouse. I think your 10 evidence on the last occasion was that they couldn't be 11 manned because they were outside the perimeter fence and 12 therefore under the complete control of the Gendarmes 13 who said point blank they weren't going to man the 14 towers, have I got that right? 15 <b>A. The guard towers were installed for the Gendarmes or the 16 GGF who were actually there previously.</b> 17 Q. I am not talking about back in the day during the 18 construction stage. I am focusing much more on the -- 19 <b>A. Yes, they were never destined for the civilian guards. 20 They were always installed for the Gendarmes or military 21 on site.</b> 22 Q. And the Gendarmes said, we're not going to do it? 23 <b>A. They said we'll keep them in case of an emergency. That 24 was the general idea. We'll -- if we know there's an 25 impending emergency we will mount the towers but the</b></p> <p style="text-align: center;">Page 41</p>	<p>1 <b>A. To protect the base.</b> 2 Q. But since they are now all under Algerian control there 3 is a slight shift in dynamic, wasn't it, that you have 4 lost control of the Algerian guards, passed over to 5 Sonatrach, which is very much a government controlled 6 company, working with the military that you have told us 7 are either very closely part of the government or de 8 facto the government. I am just wondering whether that 9 might have been a change in circumstance that might have 10 prompted a reappraisal? 11 <b>A. No, I haven't heard anything happen along those lines at 12 all.</b> 13 Q. Would it have been possible to move the guard tower 14 inside the perimeter fence? 15 <b>A. Would it have been possible? Yes, anything would have 16 been possible.</b> 17 Q. Any thought given to that? 18 <b>A. No.</b> 19 Q. I wanted if I could just to have your views on some of 20 the conclusions reached by the Statoil report given the 21 importance of your liaison function and given that 22 Mr Lord isn't here. I have that and I suspect -- but 23 I have it in witness statement bundle 4. It is in the 24 core bundle at tab 8. 25 <b>A. Okay.</b></p> <p style="text-align: center;">Page 43</p>
<p>1 <b>captain was more than happy to secure the zone with the 2 patrol vehicles. That was his -- that was the tactics 3 basically.</b> 4 Q. It wasn't felt that you were in an emergency situation 5 clearly? 6 <b>A. I'm not sure.</b> 7 Q. From what you are saying if he thought there was an 8 emergency situation -- 9 <b>A. He would have.</b> 10 Q. -- the Gendarmes would have in his assessment? 11 <b>A. Of course he would.</b> 12 Q. I just want to ask this, thinking laterally, probably 13 a silly question. Once Sonatrach took over control of 14 the civilian armed guards, so it was Algerian -- 15 <b>A. They weren't civilian armed guards.</b> 16 Q. Sorry, civilian unarmed guards. You had Algerians in 17 charge of Algerians supplementing the Algerian Gendarme 18 force, so they are all Algerians together, not working 19 under the direction of an expat. Would it have been 20 possible to ask if the civilian guards could man the 21 towers? 22 <b>A. We would have had to bring the towers inside. As I say 23 again, the towers were for the military -- the Armed 24 Forces.</b> 25 Q. I have understood that.</p> <p style="text-align: center;">Page 42</p>	<p>1 Q. Could you look at -- it is page 390. 2 <b>A. Yes.</b> 3 Q. If you look three paragraphs up from the bottom? 4 <b>A. Three lines up.</b> 5 Q. Three paragraphs. The one beginning in 2012. 6 <b>A. Yes.</b> 7 Q. And it is talking there about the plans that were in 8 place to respond to a range of incidents, all sorts of 9 health and safety plans and drills and so on. Then in 10 the next paragraph it says: 11 "No exercise scenario envisaged a terrorist attack 12 on the In Amenas site." 13 Is that right as a matter of fact? 14 <b>A. No, because the military carried out regular exercise 15 scenarios around that, around the possibility. That's 16 why they carried out their drills.</b> 17 Q. I think possibly what the report is envisaging is 18 a drill that integrates an emergency scenario, people 19 inside and civilian workers? 20 <b>A. I see what it says.</b> 21 Q. At a simulated site? 22 <b>A. It also says "in which the collective capacity of the 23 local incident management team was lost at the outset", 24 is that what you are leading to?</b> 25 Q. No, not particularly. I am simply -- in the last</p> <p style="text-align: center;">Page 44</p>

1 paragraph it goes and talks about an emergency scenario  
 2 exercise by the JV which involves Statoil and so on.  
 3 I think it is envisaging some sort of integrated drill  
 4 where everybody imagines we are under attack, let's  
 5 practice what we do when we're under attack, and you can  
 6 see how everything, because you have to coordinate outer  
 7 layers and inner layers, how it all works together. Was  
 8 there ever an exercise scenario of that type?  
 9 **A. I can't remember to be perfectly honest. I can't**  
 10 **remember when there was an exercise to cover that.**  
 11 Q. Can I ask you then about page 413?  
 12 **A. Yes.**  
 13 Q. The second paragraph down. It says:  
 14 "The investigation teams has learned from interviews  
 15 with expatriate personnel that security in the [JV] was  
 16 not an area where people's views, input and feedback  
 17 were actively invited."  
 18 **A. Which chapter is that please?**  
 19 Q. It is internal page 72 of the report or page 413, second  
 20 paragraph down begins with the words "The investigation  
 21 team"?  
 22 **A. Right. "The investigation team has found no evidence"?**  
 23 THE CORONER: No the first word on the page says "Security".  
 24 **A. Yes, "Security was a recurrent topic".**  
 25 MS GOLLOP: Have a look at the second paragraph and just  
 Page 45

1 read it through to yourself.  
 2 **A. The investigation team?**  
 3 THE CORONER: Yes, that one. You have just been asked to  
 4 read that through, that paragraph through to yourself  
 5 I think. (Pause)  
 6 **A. Okay. Yes, okay.**  
 7 MS GOLLOP: What would you say about that?  
 8 **A. I wouldn't agree with that at all. Especially during**  
 9 **the Libyan and the Mali conflict the JV, the In Amenas**  
 10 **JV management team had regular town halls where they**  
 11 **gave security briefings. It became the norm. At least**  
 12 **one every person's rotations and if there was a serious**  
 13 **incident that had occurred either in Libya or in Mali**  
 14 **then that security update was given immediately and town**  
 15 **halls were formed very, very rapidly. So I believe the**  
 16 **security information was shared very quickly with all --**  
 17 **with everyone who attended the town hall meetings.**  
 18 **Every Saturday as well we had two meetings. One was**  
 19 **scheduled for the In Amenas FIMT plus senior management**  
 20 **where we would pass on security relating information**  
 21 **which would then be cascaded down to the members of the**  
 22 **team, the various departments, and we also had a meeting**  
 23 **with the Compression team as well at 1600-hours on the**  
 24 **Saturday as well to pass on security related**  
 25 **information. So I don't agree.**  
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1 Q. That is you telling other people, giving out  
 2 information.  
 3 **A. Yes.**  
 4 Q. I think what the report is talking about is collecting  
 5 information from others?  
 6 **A. Yes.**  
 7 Q. So it is talking about input not output. Not an area  
 8 with people's views, input and feedback were actively  
 9 invited?  
 10 **A. No, I don't agree and I don't recognise that at all.**  
 11 **Security was obviously a very important factor.**  
 12 **Security input is welcomed from anyone, to anyone. So**  
 13 **security can be discussed at any level.**  
 14 Q. We have one witness statement, sir, at 54B from  
 15 a gentleman called Gary Rose who suggests that he was  
 16 concerned about a lack of drills and he would organise  
 17 some of his own and that that was frowned upon by  
 18 liaison and yourself?  
 19 **A. What type of drills was he --**  
 20 Q. I think he's talking there about fire drills.  
 21 **A. Frowned? We would never frown upon a fire drill ever or**  
 22 **a security drill for that matter. I really don't**  
 23 **understand what he's inferring.**  
 24 Q. If you go back just to page 70 which is 411.  
 25 **A. Yes.**  
 Page 47

1 Q. The first two lines on the page should read "In  
 2 practice"?  
 3 **A. Yes, that's correct.**  
 4 Q. Do you see under the subheading "8.3 Failure of  
 5 imagination"?  
 6 **A. Mmm.**  
 7 Q. Second paragraph. It talks about the high degree of  
 8 trust in the military and:  
 9 "This investigation considered that that degree of  
 10 trust stood in the way of the [JV's] ability to imagine  
 11 or plan a scenario where the outer security layers  
 12 didn't work as intended."  
 13 What would you say about that?  
 14 **A. Well, I would disagree again with this statement and if**  
 15 **you just look through the security management plan and**  
 16 **all the recommendations and advice that we gave the JV**  
 17 **team over the years then you realise that we weren't**  
 18 **solely reliant on the military layers as such.**  
 19 Q. You weren't?  
 20 **A. No, we tried to reinforce the bases where we were.**  
 21 Q. So the kind of attack that occurred in January 2013 was  
 22 conceived of, risk assessed and planned for?  
 23 **A. It was risk assessed, yes, certainly.**  
 24 Q. And planned for?  
 25 **A. Planned for in what sense?**  
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<p>1 Q. In planned for in the sense of you had planned what 2 physical security you needed? 3 <b>A. Yes.</b> 4 Q. You had planned what staffing you needed? 5 <b>A. Yes.</b> 6 Q. You planned for the kind of alarm that was sounded? 7 <b>A. Yes, everything was planned for.</b> 8 Q. You planned for the lock down? Every response necessary 9 for a safe response in an attack of the kind that 10 happened had been planned for? 11 <b>A. That's correct.</b> 12 Q. 8.4, relationship with the military. It says: 13 "The JV had incomplete information about the 14 capabilities of the military providing the outer 15 security layer." 16 And I think you would agree with that, wouldn't you? 17 <b>A. Yes, yes, I would.</b> 18 Q. And then at the end of that paragraph it says: 19 "So the JV was not therefore in a position to test 20 its own planning assumptions." 21 You would have to agree with that, wouldn't you? 22 <b>A. Sorry, which one is?</b> 23 Q. The first paragraph under 8.4 beginning "The JV"? 24 <b>A. Mmm.</b> 25 Q. And it is the penultimate sentence of that paragraph,</p> <p style="text-align: center;">Page 49</p>	<p>1 <b>down in their rooms et cetera et cetera.</b> 2 Q. Did you ever do a practice lock down? 3 <b>A. No. We did on the rig sites, yes, yes.</b> 4 Q. Can I just ask, why didn't you at the facility? 5 <b>A. I don't think there was any reason why we didn't carry 6 out a camp lock down as such.</b> 7 Q. Lots of good reasons to do so though? 8 <b>A. Mmm.</b> 9 Q. Yes? 10 <b>A. Yes. I think it was -- there was also a need not to 11 worry people if you understand what I'm saying. It's 12 a need not to worry people basically.</b> 13 Q. People don't worry if you do a fire drill do they? 14 <b>A. No.</b> 15 Q. They just find a way of just saying -- 16 <b>A. No, I apologise. We did carry out a drill when I was 17 there, I'm sorry, I'm sorry, getting lost. We did carry 18 out a security drill when we did have a camp lock down. 19 When we tested the sirens, yes, we did. Yes, I'm sorry.</b> 20 Q. Just finally, at the bottom of the page it says: 21 "The distance from the camp to the living area and 22 the production area didn't allow for a rapid response." 23 This is the Gendarme camp. What do you say about 24 that? 25 <b>A. Could you tell me which chapter we're looking at now?</b></p> <p style="text-align: center;">Page 51</p>
<p>1 three lines up from the bottom of the paragraph? 2 <b>A. ... planning assumptions". Again, I don't understand 3 what they are referring to.</b> 4 Q. I suppose one assumption -- 5 <b>A. If I may, once you're outside of the physical perimeter 6 of the base you're under the protection of the Algerian 7 government. So we assume, obviously we need -- and we 8 have assurances and we received numerous assurances, 9 that we are safe from the outside of the perimeter. 10 So ... I don't know how much information I can really 11 give because obviously --</b> 12 Q. No, no, I just -- because in a sense this is very much 13 a security issue. I wanted to have your views and an 14 opportunity for you to respond. I think it is really 15 looking at the kind of attack that happened, people were 16 outside the perimeter fence but then obviously the 17 attackers got inside the perimeter fence and what it is 18 saying is you are having to trust the assurances that 19 you are given and because you have incomplete 20 information and everything is being done on the basis of 21 trust and assurances. You don't have an opportunity to 22 plan what might happen in practice? 23 <b>A. We do plan for an intervention from the Gendarmes inside 24 the base. That is the lock down, the camp lock down 25 basically and having all personnel to lock themselves</b></p> <p style="text-align: center;">Page 50</p>	<p>1 THE CORONER: So bottom of -- do you have 411? 2 <b>A. Yes.</b> 3 THE CORONER: Go to the last paragraph and then the last 4 sentence of it. 5 <b>A. Yes.</b> 6 THE CORONER: And it is saying the distance from the camp, 7 so the Gendarme camp, the distance from there to the 8 living area and the production area didn't allow for 9 a rapid response. 10 <b>A. Well, the Gendarmes, the drills that they carried out, 11 sir, they responded within 10-minutes, the QRF team, so 12 I don't know if that would be classed as rapid. It 13 would certainly be classed as rapid, less than 14 10-minutes.</b> 15 MS GOLLOP: That is the one drill that you saw? 16 <b>A. Yes. In Paul's handover notes he actually told me that 17 the Gendarmes were about to carry out a number of drills 18 around the BdV and the CPF as well.</b> 19 THE CORONER: I am sorry, the ten minutes is to do what? To 20 be ready to deploy or to actually have deployed and gone 21 somewhere? 22 <b>A. Yes, to be in position.</b> 23 THE CORONER: So they wouldn't have moved within the ten 24 minutes but they would then be ready to say tell us 25 where to go?</p> <p style="text-align: center;">Page 52</p>

<p>1 <b>A. Within receiving the alert ten minutes later they would</b>  2 <b>be on location, either at the CPF or the BdV.</b>  3 THE CORONER: So they would have got ready and they would be  4 somewhere?  5 <b>A. They were always ready. They were ready 24 hours a day.</b>  6 THE CORONER: They were waiting there?  7 <b>A. They were waiting basically for an intervention.</b>  8 THE CORONER: So it is ten minutes to get somewhere?  9 <b>A. Yes, it is to leave to cabin where they were, the QRF</b>  10 <b>cabin, to get into the vehicles and go to the designated</b>  11 <b>areas.</b>  12 MS GOLLOP: Thank you.  13 <b>A. Thank you.</b>  14 <b>Questions from MR FLINN</b>  15 MR FLINN: Mr Fitzpatrick, my name is Matthew Flinn, I ask  16 questions on behalf of the families of Garry Barlow,  17 Carlos Bilsland, Paul Morgan and Kenneth Whiteside.  18 A question firstly about communications. Do you  19 know if mobile phones were issued to workers on site?  20 <b>A. Yes, they were, work mobiles. I don't know specifically</b>  21 <b>which people on site.</b>  22 Q. Who did that? Was that liaison or was that JV?  23 <b>A. No, that was the communications, ITC department who</b>  24 <b>would give those phones out.</b>  25 Q. And you have indicated you didn't know to whom they were</p> <p style="text-align: center;">Page 53</p>	<p>1 Q. What about the crisis management people involved in that  2 aspect?  3 <b>A. We all had designated telephones and pagers as well.</b>  4 Q. Move on to security alarms. I think you have already  5 confirmed that the CPF did not have a specific security  6 alarm fitted, it just had what would be a continuous  7 alarm which needed to operated manually, is that  8 correct?  9 <b>A. Yes, it was the fire alarm basically that we used</b>  10 <b>intermittently.</b>  11 Q. And the responses to a continuous alarm as opposed to an  12 intermittent alarm would be different, wouldn't they?  13 <b>A. Yes.</b>  14 Q. And for a continuous alarm it would be congregating at  15 various muster points and intermittent alarm going into  16 lock down?  17 <b>A. Yes.</b>  18 Q. I think you just indicated to Ms Gollop you were aware  19 of one security drill, is that right, in terms of a --  20 <b>A. I participated in one security drill.</b>  21 Q. When did that take place?  22 <b>A. That was prior to handing over. That was when the new</b>  23 <b>sirens were installed in the BdV basically.</b>  24 Q. When was that?  25 <b>A. We are looking at maybe certainly in 2012.</b></p> <p style="text-align: center;">Page 55</p>
<p>1 given. Do you know what proportion they were given to?  2 <b>A. What I'm aware of is they were all FIMT. The senior</b>  3 <b>managers were all given them obviously, all the liaison</b>  4 <b>team.</b>  5 Q. Is there any reason why to your knowledge it wouldn't  6 have been possible to make sure that every expat worker  7 on site had a cellphone issued to them?  8 <b>A. No, no.</b>  9 Q. Was there a centralised list of all the cellphone  10 numbers of the expat workers on site?  11 <b>A. Yes, there was, yes.</b>  12 Q. Who had access to that list?  13 <b>A. Everyone had access. That was on the server.</b>  14 Q. And how often was it updated?  15 <b>A. Regularly, monthly I believe.</b>  16 Q. Was there a system in place whereby you could  17 communicate with all the workers' mobile phones en mass  18 as it were, so send a general text message to all  19 workers?  20 <b>A. To all workers? No, I'm not sure but there certainly</b>  21 <b>was with the FIMT, the senior managers, yes.</b>  22 Q. And in terms of finding out whether or not a message of  23 that nature was able to be sent to all the listed mobile  24 phones who would be the best person to ask about that?  25 <b>A. ITC again, the ITC department I suspect.</b></p> <p style="text-align: center;">Page 54</p>	<p>1 Q. We are in around about what time in 2012?  2 <b>A. I think second Q, third Q in 2012 but I can't recall.</b>  3 Q. Did that apply at the CPF as well?  4 <b>A. No, it was the BdV.</b>  5 Q. Mr Cobb gave a statement to the coroner in which he says  6 he couldn't recall any security drills taking place  7 during his tenure and so based on your recollection he  8 is wrong about that?  9 <b>A. Yes, yes.</b>  10 Q. Was there ever any information given to people about how  11 to hide effectively in the event of a lock down?  12 <b>A. Yes, there was. We gave detailed security briefings on</b>  13 <b>arrival, all personnel would receive these briefings on</b>  14 <b>arrival and they were told in very detailed --</b>  15 Q. I understand they went through an induction process?  16 <b>A. Yes they did.</b>  17 Q. And they were told they needed to take cover if they  18 were outside and hide?  19 <b>A. Yes.</b>  20 Q. Was that practised with people?  21 <b>A. I can't remember. I can't recall, no.</b>  22 Q. I would like to move on and seek some clarification  23 about your liaison with the Gendarmes. I'm aware we  24 have covered this topic a few times so I will try not to  25 be redundant.</p> <p style="text-align: center;">Page 56</p>

14 (Pages 53 to 56)

<p>1 Ms Dolan asked you if it was right that your role 2 was to assess security requirements and advise on plans 3 to meet those requirements and that was one of your 4 functions, wasn't it?</p> <p>5 <b>A. Mmm.</b></p> <p>6 Q. But you indicated initially to her that that was your 7 function until the management structure was changed and 8 handed over to Sonatrach. So, sir, for your reference 9 that is at page 66 of the day that he gave evidence 10 previously. At a later point however you said that you 11 were doing everything you were doing before the change 12 except that the day-to-day management of the internal 13 guard force was handed over. So which of those two is 14 correct?</p> <p>15 <b>A. You will have the document from Sonatrach and I can't -- 16 it was referred to during my first statement.</b></p> <p>17 Q. Is this the memo from late 2012?</p> <p>18 <b>A. Yes, it specifically -- yes, it is specifically stating 19 what we can no longer do basically.</b></p> <p>20 Q. Yes, I think that is at page 13 of the green bundle if 21 you want to turn to it. But after the change happened 22 did you continue to liaise with the Gendarmes?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. Now, Bill Johnston has not yet given oral evidence for 25 the inquest but he has given a statement to the coroner</p> <p style="text-align: center;">Page 57</p>	<p>1 <b>A. Yes.</b></p> <p>2 Q. -- in the latter half of 2012. Did that lead to any 3 confusion?</p> <p>4 <b>A. Not that I can see, no. There were times when we 5 liaised together. There were times when we go over 6 together for meetings.</b></p> <p>7 Q. Was there a sense of which entity was the primary point 8 of contact with the Gendarmes?</p> <p>9 <b>A. No, no.</b></p> <p>10 Q. Following the change to the SSI structure did you 11 perceive that pursuant to SSI taking more control of 12 both the management of the guards and to some extent 13 liaising with the Gendarmes, was there any decrease in 14 the information sharing or cooperation that you as the 15 on site liaison team had with the Gendarmes?</p> <p>16 <b>A. We had very a close relationship, Paul and myself, with 17 the Gendarmes and we would speak on a daily basis. So 18 the relationship never changed and the information 19 sharing never changed during that time.</b></p> <p>20 Q. Moving on to the military more broadly. You said in 21 oral evidence to Ms Dolan that when the Gendarmes took 22 over local external security, if I can put it that way, 23 in around 2008 you did not have as much contact directly 24 with the Algerian military?</p> <p>25 <b>A. Yes, that's correct.</b></p> <p style="text-align: center;">Page 59</p>
<p>1 and in it at paragraph 11 he says that as a result of 2 the change to SSI at the time of the attack "all of the 3 liaison team's contact with the Gendarmes should have 4 been through the SSI organisation"?</p> <p>5 <b>A. That's correct.</b></p> <p>6 Q. So tallying those up is it your understanding that 7 following the change the Gendarmerie's primary point of 8 contact was the ASI as opposed to the liaison?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. But you have indicated that you remained --</p> <p>11 <b>A. We did, because --</b></p> <p>12 Q. -- involved?</p> <p>13 <b>A. -- because we had local escorts. It was site specific. 14 We had local escorts to coordinate that the ASI wasn't 15 responsible for so we continued with the coordinating 16 the local escorts basically.</b></p> <p>17 Q. So following the change in July 2012 you continued to 18 liaise with the Gendarmes in regards to escorts?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. But not in respect of other matters?</p> <p>21 <b>A. Yes, security, security, you know, attempting to wean 22 any security information from them possible.</b></p> <p>23 Q. So what I am understanding from what you are saying is 24 that essentially both the liaison team and the ASI were 25 liaising with the Gendarmes --</p> <p style="text-align: center;">Page 58</p>	<p>1 Q. I think you said that you only had conversations with 2 them when they came to visit?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. How frequently did representatives of the military come 5 to visit the site?</p> <p>6 <b>A. Obviously if we were invited to meetings we would know, 7 but they would visit site regularly and we wouldn't be 8 told about it. We would just see the vehicles arrive on 9 site basically.</b></p> <p>10 Q. Can you recall when the last time they visited was prior 11 to the attacks?</p> <p>12 <b>A. No, I can't recall.</b></p> <p>13 Q. Can you recall --</p> <p>14 <b>A. If I can explain, In Amenas is approximately 15 60 kilometres by road, so 45 kilometres line of site, 16 and you would have regular visits from the authorities, 17 the military authorities from In Amenas, regularly, 18 weekly.</b></p> <p>19 Q. Would they speak to you weekly?</p> <p>20 <b>A. No, they wouldn't. They would only if they would want 21 to see us or invite us along for a meeting. Our chain 22 of command, it wouldn't be a chain of command but we 23 would gain all our information from the local Gendarme 24 commander.</b></p> <p>25 Q. So following 2008 on a day to day basis you would liaise</p> <p style="text-align: center;">Page 60</p>

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<p>1 with the Gendarmes and not the broader military but you 2 would liaise with the military if, for example, they 3 came to the site and asked to speak to you? 4 <b>A. Most definitely, yes.</b> 5 Q. When you gave evidence last week you talked about the 6 broader protection force, the GGF and the also the ANP 7 which guarded the oil and gas producing regions of 8 southern Algeria, is that right? 9 <b>A. Yes.</b> 10 Q. And you also assisted Mr Owen-Thomas this morning with 11 the numbers that you recall. Just to confirm that 12 information came from official government announcements? 13 <b>A. Yes, it did.</b> 14 Q. It was never communicated to you directly by the 15 military? 16 <b>A. No, no.</b> 17 Q. And I think you have already confirmed that you didn't 18 have any information as to how they carried out their 19 patrols of that region or deployed their resources? 20 <b>A. No.</b> 21 Q. Having regard to your role would you expect to be able 22 to obtain that information? 23 <b>A. No, they wouldn't -- that would be confidential.</b> 24 Q. If it was to be obtained at all it would have to be 25 sought from people much more senior to yourself, is that</p> <p style="text-align: center;">Page 61</p>	<p>1 <b>proved false later. We would always try to gain</b> 2 <b>confirmation of the acts, and so some of these would be</b> 3 <b>in line with what the military would deny as actually</b> 4 <b>taking place.</b> 5 Q. I think you also recounted a conversation with 6 Captain Hocine and you said about those conversations 7 "they don't want to worry expats. They don't want to 8 stop any foreign investments so basically they don't 9 want to talk about security issues or serious terrorist 10 issues." 11 Do you recall that? 12 <b>A. Yes, I do.</b> 13 Q. Did you detect an unwillingness on the part of the 14 Gendarmerie to acknowledge the risks that were facing 15 the site and the region? 16 <b>A. No, not in that sense, no.</b> 17 Q. They certainly had a material motivation to provide you 18 with reassurance, didn't they? 19 <b>A. They did, yes.</b> 20 Q. And to your knowledge did that kind of attitude hold 21 true for the broader military? 22 <b>A. I honestly can't comment on that.</b> 23 Q. You can't comment on that? 24 <b>A. No.</b> 25 Q. Based on the fact that they obviously had reasons for</p> <p style="text-align: center;">Page 63</p>
<p>1 right? 2 <b>A. Most definitely.</b> 3 Q. What sort of level are we talking about? 4 <b>A. Government level I would suspect.</b> 5 Q. Shareholder company level? 6 <b>A. No, government level.</b> 7 Q. If there was to be any pressure brought to bear on the 8 military to be more forthcoming in the information they 9 provided you would need support from higher up your line 10 of management chain I imagine? 11 <b>A. Yes, the government wouldn't disclose any military</b> 12 <b>tactic, movements or troop movements with anyone</b> 13 <b>basically outside of their own government.</b> 14 Q. So in terms of advising the JV on that aspect of 15 security all you could say is that the border and 16 regional protection was in the hands of the military? 17 <b>A. No, we can convey the assured -- assurances we received</b> 18 <b>from the Algerian government.</b> 19 Q. Just turning to that particular topic. When you had 20 discussions with the Gendarmerie about security you said 21 to Ms Dolan that when you spoke to the Gendarmes about 22 security issues in the country they would often deny any 23 issues and say it was peaceful and safe for expats? 24 <b>A. That's correct, sometimes they would. Some of the</b> 25 <b>articles that we received in newspapers were actually</b></p> <p style="text-align: center;">Page 62</p>	<p>1 wanting to reassure that you were going to be perfectly 2 safe, including not wanting to dissuade foreign 3 investment, surely when they told you that you were in 4 a perfectly safe area that had to be taken with 5 a healthy degree of scepticism? 6 <b>A. Yes, but you need to trust the host country when they</b> 7 <b>tell you you're being protected, you are being secured,</b> 8 <b>you are working in a safe environment, you need to</b> 9 <b>accept that trust. The UK government obviously accepted</b> 10 <b>that trust.</b> 11 Q. Yes, I am not saying that you had to outright disbelieve 12 them but you needed to take the information they were 13 giving, acknowledging firstly they couldn't guarantee 14 your safety and secondly if they were experiencing 15 problems they might not be entirely forthcoming about 16 them with you and you had to plan security on that 17 basis? 18 <b>A. Yes, and we did.</b> 19 Q. Moving on to guard towers, just a few questions about 20 that. 21 They were situated outside the perimeter so if they 22 were to be manned by Gendarmerie that would be armed 23 Gendarmerie? 24 <b>A. Yes, of course.</b> 25 Q. I think you mentioned that it would have been your</p> <p style="text-align: center;">Page 64</p>

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<p>1 preference that they were manned?</p> <p>2 <b>A. Mmm.</b></p> <p>3 Q. And that you communicated that view up your management</p> <p>4 line?</p> <p>5 <b>A. Yes, I think I did, yes. I think -- there were -- like</b></p> <p>6 <b>I said earlier, they were manned originally.</b></p> <p>7 Q. Yes.</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. When the Gendarmerie refused to you, as an on site</p> <p>10 liaison supervisor, were not in a position to change</p> <p>11 that yourself?</p> <p>12 <b>A. No.</b></p> <p>13 Q. Do you feel that you had much influence over them at</p> <p>14 all?</p> <p>15 <b>A. Guidance, we tried to guide, we tried to advise, we</b></p> <p>16 <b>tried to coax them into certain things but military</b></p> <p>17 <b>tactic wise it was very, very difficult.</b></p> <p>18 Q. So if you were to effect a change in their stance, once</p> <p>19 again you would need quite a lot of input and support</p> <p>20 from higher levels I would imagine?</p> <p>21 <b>A. Mmm.</b></p> <p>22 Q. Were you aware of any pressure being brought to bear on</p> <p>23 the Gendarmes by either your line manager or the JV</p> <p>24 participating companies?</p> <p>25 <b>A. No, I wasn't aware of that, no.</b></p> <p style="text-align: center;">Page 65</p>	<p>1 Q. So that would be an area, if it was 2 or 3 kilometres,</p> <p>2 between 40 and 80 kilometres squared. And you have said</p> <p>3 that it was patrolled by a single consolidated convoy of</p> <p>4 five vehicles?</p> <p>5 <b>A. That is my understanding again, but I wasn't there at</b></p> <p>6 <b>the time so this may have changed.</b></p> <p>7 Q. Was it genuinely your view that in an area that size,</p> <p>8 a single convoy of five vehicles at night was</p> <p>9 sufficient?</p> <p>10 <b>A. It's very difficult to comment.</b></p> <p>11 Q. Why was there a difference between the number of</p> <p>12 vehicles during the day and the number of vehicles</p> <p>13 during the night?</p> <p>14 <b>A. Because of the work expectations, the work schedule, the</b></p> <p>15 <b>fact that most of them, a lot of these vehicles were</b></p> <p>16 <b>actually used for individual escorts out into the</b></p> <p>17 <b>(inaudible) system.</b></p> <p>18 Q. You have anticipated my next question because in one</p> <p>19 answer you gave to Ms Dolan last week you suggested that</p> <p>20 12 were given during the day and five during the night</p> <p>21 because during the night there was no need for</p> <p>22 individual escorts?</p> <p>23 <b>A. Yes, that's correct.</b></p> <p>24 Q. So during the day it wouldn't be the case that 12</p> <p>25 vehicles were always patrolling around. Some of them</p> <p style="text-align: center;">Page 67</p>
<p>1 Q. In respect of that issue?</p> <p>2 <b>A. No.</b></p> <p>3 Q. Just briefly on patrols. The zone which you recall</p> <p>4 being continually patrolled, I think you said that's</p> <p>5 between the BdV, the CPF and VCPs 1 and 2?</p> <p>6 <b>A. Yes, that's correct.</b></p> <p>7 Q. I would just like to clarify with you the evidence you</p> <p>8 have given about the size of the zone. When you gave</p> <p>9 evidence to Ms Dolan you suggested at one point that</p> <p>10 there would be a 2 to 3-kilometre circumference of the</p> <p>11 area and at another point you referred to there being</p> <p>12 a radius of 2 to 3 kilometres. Can I just confirm which</p> <p>13 one you were actually meaning?</p> <p>14 <b>A. Yes, the patrols would take place obviously within the</b></p> <p>15 <b>CPF area and to a maximum I suspect, a maximum of 2 to</b></p> <p>16 <b>3 kilometres around the CPF area.</b></p> <p>17 Q. I just want to clarify what you mean by around. You are</p> <p>18 not saying that if they did a loop they would travel 2</p> <p>19 to 3 kilometres?</p> <p>20 <b>A. No.</b></p> <p>21 Q. If they were to travel out in a straight line from</p> <p>22 a central point that would be 2 to 3 kilometres?</p> <p>23 <b>A. Yes, that was my impression.</b></p> <p>24 Q. That was your understanding?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 66</p>	<p>1 would be earmarked for escort and individual or work</p> <p>2 projects?</p> <p>3 <b>A. Yes, various well sites, yes, that's correct.</b></p> <p>4 Q. You say that the difference between the day and the</p> <p>5 night stems from the fact that obviously there are less</p> <p>6 people moving around at night essentially. That is what</p> <p>7 it comes to, isn't it?</p> <p>8 <b>A. No, no.</b></p> <p>9 Q. The number of vehicles at night is less?</p> <p>10 <b>A. It's what was imposed on the JV by the Gendarmes</b></p> <p>11 <b>basically.</b></p> <p>12 Q. Yes, I understand but we are exploring the rationale for</p> <p>13 that and I understood you to indicate that it was</p> <p>14 because there were less people moving around at night so</p> <p>15 you wouldn't need escorts?</p> <p>16 <b>A. No, it wasn't. It was simply the Gendarmes requested</b></p> <p>17 <b>five vehicles.</b></p> <p>18 THE CORONER: Do you know what the reason was then for</p> <p>19 having five at night and 12 in the day?</p> <p>20 <b>A. Well, the 12 during the day was because we needed those</b></p> <p>21 <b>vehicles to carry out individual escorts into the</b></p> <p>22 <b>gathering system. So once we are out in the field, say</b></p> <p>23 <b>5 kilometres away, they would be taken away from the</b></p> <p>24 <b>main.</b></p> <p>25 THE CORONER: Do you know what the reason was for the --</p> <p style="text-align: center;">Page 68</p>

<p>1 <b>A. Just 12 because of the individual escorts. That's all</b> 2 <b>I believe.</b> 3 THE CORONER: All right, yes. 4 MR FLINN: Thank you, sir. 5 Does it follow from that the number of vehicles 6 actually patrolling during the day was five as well? 7 <b>A. I can't confirm that I am afraid.</b> 8 Q. You don't know that. Would you agree that there was an 9 increased risk at night of vehicles approaching the site 10 or attempting to approach the site undetected? 11 <b>A. There is a risk. There is a risk, yes.</b> 12 Q. I'd like to ask just one question about the drivers 13 strike issue. Paragraph 9 of the witness statement you 14 gave you said: 15 "The drivers action and grievance was initially 16 against Sonatrach but I believe that for a number of 17 reasons this shifted generally towards the [JV] in its 18 entirety." 19 Why did you get that impression? 20 <b>A. Negotiations when they first began with the drivers it</b> 21 <b>was purely, it was aimed at Sonatrach and initially the</b> 22 <b>drivers didn't want to involve BP or Statoil in any of</b> 23 <b>the negotiations. And they said so. They said as much.</b> 24 <b>They said basically we don't want to involve BP,</b> 25 <b>Statoil. It's not your problem. This is our</b> Page 69</p>	<p>1 <b>A. Well, the Gendarmes had always had a quick reaction</b> 2 <b>force. But they came, as I explained they came to the</b> 3 <b>JV and they requested an additional accommodation block</b> 4 <b>to segregate the QRF team from the remaining entity or</b> 5 <b>the rest of the accommodation area for the Gendarmes who</b> 6 <b>were on standby or off duty. And the JV actually</b> 7 <b>installed, fabricated and installed an additional cabin</b> 8 <b>into the Gendarme base for this. So that's the time</b> 9 <b>when we were informed about the QRF and the need for</b> 10 <b>additional accommodation for the QRF.</b> 11 Q. When did you come by the understanding of this ten 12 minute time mark? 13 <b>A. Working with the captain, speaking with the captain. He</b> 14 <b>was the one who informed us of this.</b> 15 Q. I know. When did he inform you of this? 16 <b>A. During the QRF, during the installation of the cabins</b> 17 <b>et cetera.</b> 18 Q. Around what year was that? 19 <b>A. I can't recall when we installed the cabin but it was</b> 20 <b>before 2012 I'm sure.</b> 21 Q. Ms Dolan asked you if liaison vehicles had any special 22 procedures for when they reached vehicle checkpoints as 23 part of outbound convoys and you said that any vehicle 24 arriving at a checkpoint at night especially under the 25 cover of darkness would stop their vehicle and turn on Page 71</p>
<p>1 <b>integration into Sonatrach. Sonatrach is the problem.</b> 2 <b>And I think the more and more we were caught up in the</b> 3 <b>negotiations, so BP and Statoil were actually caught up</b> 4 <b>in these negotiations and at certain times took a lead</b> 5 <b>and I think the drivers were under the illusion that BP</b> 6 <b>or Statoil could do something for them in that domain,</b> 7 <b>ie get them -- have them integrated totally into</b> 8 <b>Sonatrach.</b> 9 Q. How did that manifest? Were you hearing drivers say 10 negative things about Statoil and BP? 11 <b>A. No, we never heard any threats towards expats or</b> 12 <b>anything, no.</b> 13 Q. How did this shift in attitude show itself? 14 <b>A. Towards the JV?</b> 15 Q. Yes, you understood that to be happening? 16 <b>A. Just sitting through negotiations, trust levels</b> 17 <b>et cetera, you know.</b> 18 Q. Rapid reaction force. Mr Cobb said that he first 19 learned of the rapid reaction force in late 2012 during 20 the drivers strike. Now I understood you to say that 21 you were aware of a drill taking place for the rapid 22 reaction force in the second quarter of 2012? 23 <b>A. Mmm.</b> 24 Q. I just wanted to confirm with you when you first learnt 25 about the rapid reaction force? Page 70</p>	<p>1 the internal light inside to allow the guard to identify 2 them? 3 <b>A. That's correct.</b> 4 Q. Can I just clarify, was that a procedure for liaison 5 vehicles specifically or for all convoy vehicles? 6 <b>A. All vehicles.</b> 7 Q. If that was the procedure which vehicle would tend to 8 turn on their lights first? 9 <b>A. The lead vehicle.</b> 10 Q. One final question, Mr Fitzpatrick. In response to 11 questions from Mr Owen-Thomas you said that the risk of 12 attack on the site was recognised? 13 <b>A. Mmm.</b> 14 Q. But you didn't give detailed consideration to the 15 precise form that that attack might take. Did 16 I understand you correctly? 17 <b>A. No, no, we did. We carried out risk assessments where</b> 18 <b>we identified all the possible terrorist attacks from</b> 19 <b>the VBIED to an IED, to an armed attack on the base.</b> 20 Q. And those are generic categories of different forms of 21 attack, that might occur. Did it go into any more 22 detail than that? 23 <b>A. Yes. During the compression work which had just got</b> 24 <b>under way we carried out two security risk assessments</b> 25 <b>for that basically for two different entry points into</b> Page 72</p>

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<p>1 <b>the CPF that were about to be opened. Obviously the</b>                  2 <b>perimeter fence would be opened so we carried out risk</b>                  3 <b>assessments for that, to identify penetration areas</b>                  4 <b>et cetera.</b>                  5 Q. Did you give any positive advice up your chain of                  6 management that if an attack was to occur on the site it                  7 would be of any particular scale?                  8 <b>A. An armed attack on the camp, we talk about a group.</b>                  9 Q. A group?                  10 <b>A. A group, yes.</b>                  11 MR FLINN: Mr Fitzpatrick, thank you very much. I don't                  12 have any further questions. Sir, thank you.                  13 Questions from MR POPAT                  14 MR POPAT: Good morning, Mr Fitzpatrick. I ask questions on                  15 behalf of BP. I am going to try and cover with you                  16 a number of topics. Some of which will require us to                  17 look at some documents, but in other places I won't go                  18 to the documents themselves unless you feel you need to                  19 remind yourself of the contents of them just to speed                  20 things along if that's okay with you.                  21 Can I just start by understanding with you your                  22 personal security related background. I know it is set                  23 out in your statement in summary form but I don't think                  24 you have actually given oral evidence about it. Can you                  25 just explain your military background and then your</p> <p style="text-align: center;">Page 73</p>	<p>1 your understanding of your own personal experience and                  2 that of your colleagues. They have a sound                  3 understanding of military life?                  4 <b>A. Mmm.</b>                  5 Q. Well founded experience of international industrial                  6 security issues. Experience of working in remote areas                  7 internationally?                  8 <b>A. Correct.</b>                  9 Q. Sound experience of working in a liaison activity for                  10 the hydrocarbon sector in Algeria or similar                  11 environment?                  12 <b>A. Yes.</b>                  13 Q. Would that accord with your understanding and of your                  14 colleagues as well?                  15 <b>A. Yes, certainly.</b>                  16 Q. AFMC itself is a private company. It is made up of the                  17 JV between Sterling and Redmed. We understand that.                  18 And that is the company that was contracted to provide                  19 the security and liaison services we have discussed over                  20 the course of your evidence. Again, just perhaps in                  21 summary form, because you set this out in your witness                  22 statement, I just want to make sure that this accords                  23 with your view and understanding now as to the services                  24 provided by AFMC. You said in your witness statement,                  25 which was dated April 2013, that your company is</p> <p style="text-align: center;">Page 75</p>
<p>1 experience working for security companies in Algeria?                  2 <b>A. Yes, I spent 17 and a half years within the French</b>                  3 <b>Foreign Legion and rose to the rank of platoon</b>                  4 <b>commander.</b>                  5 Q. And with the Foreign Legion you served in central and                  6 north Africa?                  7 <b>A. Yes, I did, yes, most of the Arab countries where there</b>                  8 <b>is French interests.</b>                  9 Q. And then I think from 2001 you worked for a private                  10 security company?                  11 <b>A. Yes.</b>                  12 Q. Is that right?                  13 <b>A. Yes, I worked for Armour Group Defence Systems Limited</b>                  14 <b>within Algeria on the Bechtel pipeline which is the</b>                  15 <b>pipeline for In Salah gas project.</b>                  16 Q. So from 2001 onwards you worked specifically in                  17 a security function in Algeria specifically in relation                  18 to oil and gas facilities?                  19 <b>A. That's correct.</b>                  20 Q. In the contract between the JV and the liaison team the                  21 AFMC company, which you were taken to very briefly and                  22 somebody asked you if you were aware of it and you                  23 weren't aware of it, but in that contract it sets out                  24 a number of things that people who work for the liaison                  25 team must have. I just want to see if these accord with</p> <p style="text-align: center;">Page 74</p>	<p>1 contracted to provide security services, to assess the                  2 security requirements of a particular site or project                  3 with a client and advise on plans to address these                  4 requirements?                  5 <b>A. Yes.</b>                  6 Q. You said you liaised with the Algerian governmental                  7 agencies, primarily the military, and you said, page 6,                  8 made today security priority apart from the security of                  9 the physical facility, is the protection of expat                  10 workers, the rules concerning safeguarding of expats                  11 mandated by the Algerian government. Yes?                  12 <b>A. Yes, I agree.</b>                  13 Q. And you said in your statement, again, page 6 that over                  14 the years you have helped design what you have described                  15 as the SOPs -- just confirm what that means?                  16 <b>A. Standing operating procedures.</b>                  17 Q. You provided with your witness statement a document                  18 which is behind tab 21 of the core bundle. Again, I am                  19 not going to ask you to look it up. I am going to                  20 summarise some of the things in there. That is                  21 a document in which the liaison team describes its                  22 functions. Do you remember the sort of --                  23 <b>A. Yes, yes.</b>                  24 Q. And in that document it says that the mission of the                  25 liaison team is to provide personnel and systems to</p> <p style="text-align: center;">Page 76</p>

<p>1 protect people, property and premises?  2 <b>A. That was the initial contract, yes.</b>  3 Q. The security objectives included the protection of life  4 and to provide adequate and effective liaison with the  5 military in order to encourage zone patrolling and to  6 secure and protect project areas?  7 <b>A. Yes.</b>  8 Q. And it also said that the liaison team must be the sole  9 point of contact with the military and Gendarmes?  10 <b>A. Yes.</b>  11 Q. Do you understand that your direct role in safeguarding  12 internal security changed in --  13 <b>A. Most of what you have just described changed basically.</b>  14 Q. Can we just understand whether it did because your role  15 continued to be to act as the security professionals  16 contracted to the JV, yes?  17 <b>A. Liaison, liaison.</b>  18 Q. Not you personally, I mean liaison team, that continued  19 to be the role that was carried out by the liaison team.  20 <b>A. I can't confirm because I know for a fact that the</b>  21 <b>responsibilities you have highlighted were taken away</b>  22 <b>from us, were taken away from the liaison team.</b>  23 Q. Certainly some of the responsibilities were taken away  24 in the way you have explained but what continued to be  25 the position, and this is just what I want to understand</p> <p style="text-align: center;">Page 77</p>	<p>1 <b>basic levels, any repair work, fence work, the</b>  2 <b>responsibility was all over to the ASI.</b>  3 Q. I am really not questioning that. You have explained  4 that and I certainly understand that and I think  5 everyone else does as well. I just want to try and  6 understand what your role continued to be. It continued  7 to be to provide advice and ensure insofar as you  8 reasonably could the security of the people working at  9 In Amenas and installations within In Amenas?  10 <b>A. Mmm.</b>  11 Q. Yes?  12 <b>A. We tried.</b>  13 Q. Subject?  14 <b>A. Subject to the responsibilities that were taken away</b>  15 <b>from us, yes.</b>  16 Q. And it continued, certainly so far as the JV was  17 concerned, to be the sole point of contact with the  18 military and the Gendarmes insofar as there was to be  19 a contact, in other words, the JV people couldn't go off  20 and speak to the military or the Gendarmes themselves?  21 <b>A. Yes, that's correct, but actually that was the</b>  22 <b>responsibility officially taken away from us by</b>  23 <b>Sonatrach as well.</b>  24 Q. You carried on liaising with certain of the Gendarmes in  25 the way you have described but the direct responsibility</p> <p style="text-align: center;">Page 79</p>
<p>1 with you, is that the liaison team continued to be the  2 security professional service, call it what you like,  3 attached to the JV?  4 <b>A. Yes, we were also requested by JV management to mentor</b>  5 <b>the new structure, the new ASI structure, the SSI</b>  6 <b>structure.</b>  7 Q. And that involved having staff at Hassi Messaoud, at  8 In Salah and In Amenas?  9 <b>A. Mmm.</b>  10 Q. The requirements involved the liaison team providing its  11 security expertise and experience specifically in  12 relation to the securing of oil and gas facilities in  13 this region?  14 <b>A. Yes, again, that was one of our responsibilities that</b>  15 <b>was taken away from us.</b>  16 Q. Mr Fitzpatrick --  17 <b>A. We were no longer responsible for internal security.</b>  18 Q. Subject to that point, it continued to be the role and  19 the contractual obligation of the liaison team to  20 provide that security service to the JV, subject to your  21 ability to actually monitor and manage the guards?  22 <b>A. I understand.</b>  23 Q. Is that right?  24 <b>A. I understand and all the infrastructure as well went</b>  25 <b>over to the ASI as well. So any repair works, just</b></p> <p style="text-align: center;">Page 78</p>	<p>1 under the arrangements passed over to SSI and the ASI in  2 particular?  3 <b>A. Yes.</b>  4 Q. But those were the services you provided and continued  5 to provide throughout. Again, subject to the  6 restrictions on what you could do so far as the internal  7 security was concerned, yes?  8 <b>A. Yes, yes.</b>  9 Q. We will look at some documents which were generated over  10 this time after July 2012 as well in which you are  11 carrying out that function and providing that advice and  12 recommendations.  13 But it was to provide those services that the  14 structure of the liaison team had been set up and  15 remained the same throughout this period. There was an  16 ALM based at Hassi Messaoud?  17 <b>A. That's correct.</b>  18 Q. An OLS at In Amenas. You, with Mr Morgan as your  19 back-to-back?  20 <b>A. That's correct.</b>  21 Q. And below you OLCs, the operations liaison coordinators,  22 who were also based at In Amenas?  23 <b>A. Yes, that's correct.</b>  24 Q. Was there a similar arrangement so far as the OLSs and  25 OLCs were concerned in In Salah?</p> <p style="text-align: center;">Page 80</p>

20 (Pages 77 to 80)

<p>1 <b>A. Yes, there were.</b></p> <p>2 Q. The night OLC was somebody who was part of the liaison</p> <p>3 team before 2012?</p> <p>4 <b>A. The night OLC as you say was an expat at one time. He</b></p> <p>5 <b>carried out all the night patrols and he was an expat.</b></p> <p>6 Q. Was he part of the liaison team?</p> <p>7 <b>A. That was a position that was nationalised to the NOLC,</b></p> <p>8 <b>if you like, a national Algerian.</b></p> <p>9 Q. So after, let us say the summer of 2012 the night OLC</p> <p>10 became an Algerian national --</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. -- working through SSI?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. Reporting to the ASI. But otherwise the structure of</p> <p>15 the liaison team remained as it was?</p> <p>16 <b>A. The structure of the expat liaison team, yes.</b></p> <p>17 Q. In your statement, again, April 2013, you said:</p> <p>18 "I act as the point of contact between the Algerian</p> <p>19 military and the company while acting in a liaison role.</p> <p>20 We developed an agreed strategy with the military and</p> <p>21 established detailed coordinated working practices."</p> <p>22 You also said in that statement on an almost daily</p> <p>23 basis you would meet with Captain Hocine and speak to</p> <p>24 him several times a day by radio and coordinate things</p> <p>25 with him?</p> <p style="text-align: center;">Page 81</p>	<p>1 and we'll break off.</p> <p>2 MR POPAT: Certainly. Can I just hand you the document.</p> <p>3 (Handed). I will provide Mr Ritchie with the page</p> <p>4 reference. I am afraid it is in a vast amount of unused</p> <p>5 material that we have.</p> <p>6 This isn't a document you have created I don't</p> <p>7 think?</p> <p>8 <b>A. No, it's not, no.</b></p> <p>9 Q. Mr Fitzpatrick, just help us very briefly with it if you</p> <p>10 can. It is addressed at the top "Handover notes, MK to</p> <p>11 CB." It is dated 24 March 2011. If you turn over to</p> <p>12 the third page we see some details and an email address.</p> <p>13 We understand this is a handover note prepared by</p> <p>14 Mr Kennedy?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Who was Mr Kennedy?</p> <p>17 <b>A. Matt Kennedy was an expat OLC, part of the liaison team.</b></p> <p>18 Q. So he was part of the liaison team. He had</p> <p>19 a back-to-back, did he?</p> <p>20 <b>A. There was the gentleman Cheikh Belhirane. A national.</b></p> <p>21 Q. So CB refers to him. We will look at the handover notes</p> <p>22 Mr Morgan provided to you but every time the</p> <p>23 back-to-back handed over to his replacement they would</p> <p>24 produce handover notes?</p> <p>25 <b>A. Yes, that's correct.</b></p> <p style="text-align: center;">Page 83</p>
<p>1 <b>A. Mmm.</b></p> <p>2 Q. And that again, continued to be the position up</p> <p>3 to January 2013?</p> <p>4 <b>A. Yes, we didn't break contact with the military.</b></p> <p>5 Q. As part of that liaison you liaised with him in relation</p> <p>6 to the drills or exercises that they carried out which</p> <p>7 you also observed?</p> <p>8 <b>A. When they informed us of drills. There was a number of</b></p> <p>9 <b>occasions on rig sites for instance where they would</b></p> <p>10 <b>just carry out a drill without informing anyone</b></p> <p>11 <b>basically.</b></p> <p>12 Q. In relation to that you said in the course of your</p> <p>13 evidence that you participated in one drill?</p> <p>14 <b>A. That was the one, yes.</b></p> <p>15 Q. But that wasn't the only drill that took place that you</p> <p>16 were aware of?</p> <p>17 <b>A. No.</b></p> <p>18 Q. There were drills being undertaken --</p> <p>19 <b>A. Yes, Paul informed me, in handover notes, that there had</b></p> <p>20 <b>been a number of drills.</b></p> <p>21 Q. I am just going to ask you to look at one document which</p> <p>22 is in the unused material. We have lots of material.</p> <p>23 THE CORONER: Can I just say, Mr Popat, when you have</p> <p>24 finished with drills we are going to have a break.</p> <p>25 I will let you finish this point but just let me know</p> <p style="text-align: center;">Page 82</p>	<p>1 Q. And they would summarise what's being going on, issues</p> <p>2 that have arisen, things that need to be dealt with?</p> <p>3 <b>A. That's correct.</b></p> <p>4 Q. And in this, this is just one example, there are many,</p> <p>5 many others, but in this one we see on the first page he</p> <p>6 has set out, the third entry from the bottom, terrorist</p> <p>7 incidents, he has attached liaison meeting minutes for</p> <p>8 his back-to-back to read. If you just turn over to the</p> <p>9 second page you see midway through the page:</p> <p>10 "Military camp inspection. Latest inspection on</p> <p>11 Friday, 18th. 12 stop cards. All problems are being</p> <p>12 fixed and the latest tracker is on the office desk. No</p> <p>13 problems."</p> <p>14 What is a military camp inspection?</p> <p>15 <b>A. It's a health and safety inspection.</b></p> <p>16 Q. Carried out by?</p> <p>17 <b>A. By the OLC, by the health and safety adviser and the</b></p> <p>18 <b>camp doctor as well.</b></p> <p>19 Q. So they carry out an inspection within the facility,</p> <p>20 checking various health and safety issues?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. Below that he has written "Military". "The LT has been</p> <p>23 very good." Who is that likely to be?</p> <p>24 <b>A. That is the lieutenant, chef de detachment.</b></p> <p>25 Q. "The only problem was they had a 'plan de defense' last</p> <p style="text-align: center;">Page 84</p>

21 (Pages 81 to 84)

<p>1 week and did not inform me or anyone. So at 20h00</p> <p>2 suddenly there are lots of Gs --</p> <p>3 Gendarmes?</p> <p>4 <b>A. Gendarmes that's correct.</b></p> <p>5 Q. "Running around the camp with AK47s. Billy and Giancarlo</p> <p>6 were very angry about this. I had a meeting with the</p> <p>7 lieutenant and he knows it must not happen again. He</p> <p>8 must give us ten minutes to inform the expats and crew.</p> <p>9 Also LT Mehidi has taken the football to Rig 8."</p> <p>10 Which obviously caused him some concern.</p> <p>11 Now, is that the sort of drill exercise that you are</p> <p>12 referring to that would take place?</p> <p>13 <b>A. Yes, that's correct.</b></p> <p>14 Q. It describes an exercise where there are lots of</p> <p>15 Gendarmes running around the camp?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. What would that mean? What would the camp mean in this?</p> <p>18 <b>A. The camp would be the rig site.</b></p> <p>19 Q. And what they have done is they have turned up and</p> <p>20 carried out an exercise to try and simulate what they</p> <p>21 might be doing --</p> <p>22 <b>A. An attack on the rig site, yes, that's correct.</b></p> <p>23 Q. And this time with weapons and obviously caused</p> <p>24 a concern?</p> <p>25 <b>A. Yes, yes.</b></p> <p style="text-align: center;">Page 85</p>	<p>1 (12.25 pm)</p> <p>2 MR POPAT: Mr Fitzpatrick, we had just discussed briefly the</p> <p>3 question of liaison with the Gendarme. You understand</p> <p>4 it is not for the JV to liaison with the Gendarme or the</p> <p>5 military. The liaison team were the sole point of</p> <p>6 contact for doing that so far as the JV are concerned,</p> <p>7 albeit that with the change that took place in the</p> <p>8 summer of 2012 or thereabouts the specified direct route</p> <p>9 for liaison with the Gendarme was the ASI.</p> <p>10 <b>A. That's correct.</b></p> <p>11 Q. But in any event it is liaison, it is not telling the</p> <p>12 Gendarme what to do?</p> <p>13 <b>A. No, that would be impossible.</b></p> <p>14 Q. That was not something you could do. They, and the</p> <p>15 captain in particular, carried out assessments and</p> <p>16 ultimately decided how and where to deploy his troops?</p> <p>17 <b>A. That's correct.</b></p> <p>18 Q. And they were professionals with experience of assessing</p> <p>19 risks in Algeria and how best to try and provide the</p> <p>20 protection that they knew they had to provide?</p> <p>21 <b>A. That's correct.</b></p> <p>22 Q. They were aware of the need and responsibility placed</p> <p>23 upon them to provide that protection for the facility?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. There may of course be a difference of views between</p> <p style="text-align: center;">Page 87</p>
<p>1 Q. Were they the sorts of drills or exercises you were</p> <p>2 referring to when you were explaining that these</p> <p>3 exercises take place?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. They continued to take place all the way through up</p> <p>6 to January 2013, as far as you are aware?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. And you participated in one but observed others?</p> <p>9 <b>A. As an observer, yes.</b></p> <p>10 Q. And became aware of others, presumably through similar</p> <p>11 sorts of handovers and the like?</p> <p>12 <b>A. Exactly.</b></p> <p>13 MR POPAT: Thank you, sir, I am moving off.</p> <p>14 THE CORONER: Yes, we'll have a break now. So we'll take</p> <p>15 15-minutes. Can I just ask that in the break that the</p> <p>16 advocates just please liaise with Ms Dolan as to how we</p> <p>17 are going to divide up the rest of the day and whether</p> <p>18 we need the -- I just don't know how long people think</p> <p>19 the various witnesses will take but whether we need to</p> <p>20 shorten the lunch hour, what time we need to go on</p> <p>21 because I am sure that will help everybody plan their</p> <p>22 day.</p> <p>23 All right, so 15 minutes.</p> <p>24 (12.05 pm)</p> <p>25 (A short break)</p> <p style="text-align: center;">Page 86</p>	<p>1 different security professionals as to what should be</p> <p>2 done, a difference perhaps between you as a security</p> <p>3 professional and the captain of the Gendarmes who</p> <p>4 perhaps is a different type of security professional.</p> <p>5 But ultimately you didn't consider his views, or their</p> <p>6 views, to be unreasonable or untenable in how they</p> <p>7 thought they would provide that protection?</p> <p>8 <b>A. No, we didn't, no.</b></p> <p>9 Q. Take, for example, because it is a point that has been</p> <p>10 discussed with you, the point about manning the guard</p> <p>11 towers. As I understood your evidence at some stage</p> <p>12 early on certainly you thought it would be a good idea</p> <p>13 for the armed Gendarmes to man the guard towers?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. And I assume you thought that that would provide some</p> <p>16 additional protection?</p> <p>17 <b>A. Mmm.</b></p> <p>18 Q. Perhaps in general terms two benefits. One being higher</p> <p>19 up somebody would have a better view out of the camp and</p> <p>20 so potentially be better able to spot aggressors</p> <p>21 approaching than guards at ground level?</p> <p>22 <b>A. Mmm.</b></p> <p>23 Q. Yes? And second, being in the guard tower would mean</p> <p>24 that that person would be closer to the base itself and</p> <p>25 so response time would potentially be quicker?</p> <p style="text-align: center;">Page 88</p>

22 (Pages 85 to 88)

<p>1 <b>A. That's correct.</b></p> <p>2 Q. And that was a view you had as a security professional?</p> <p>3 <b>A. Mmm.</b></p> <p>4 Q. But the captain had a different view, yes?</p> <p>5 <b>A. That's correct, yes.</b></p> <p>6 Q. He thought that the ability to spot aggressors</p> <p>7 approaching would be better achieved by mobile patrols,</p> <p>8 yes?</p> <p>9 <b>A. That's correct.</b></p> <p>10 Q. And those patrols would be circling the whole</p> <p>11 circumference of the camp, further away from the camp,</p> <p>12 and therefore able to see further away from the camp any</p> <p>13 aggressors approaching the camp?</p> <p>14 <b>A. That's correct.</b></p> <p>15 Q. And of course, self-evident perhaps, any mobile patrols</p> <p>16 identifying aggressors approaching the camp at locations</p> <p>17 further away from the camp would be able to spot those</p> <p>18 aggressors sooner and further away from the camp than</p> <p>19 somebody standing guard at the guard tower?</p> <p>20 <b>A. That's correct.</b></p> <p>21 Q. So again, perhaps self evidently, if the mobile patrol</p> <p>22 is 2 kilometres and it spots a group of aggressors in</p> <p>23 a number of 4 by 4s approaching the camp and if that</p> <p>24 patrol raises that alarm that would give more time for</p> <p>25 the Gendarmes at camp and/or other patrols to mobilise</p> <p style="text-align: center;">Page 89</p>	<p>1 that the captain did take into account because</p> <p>2 unfortunately we don't have his evidence before us. But</p> <p>3 the broader point is that the decision that the captain</p> <p>4 took about not manning the guard towers was not</p> <p>5 a decision which you viewed as a security professional</p> <p>6 to be an unreasonable decision such that it was just not</p> <p>7 possible to allow it to continue?</p> <p>8 <b>A. No, of course not.</b></p> <p>9 Q. So far as the Gendarmes camp is concerned, that camp was</p> <p>10 approximately 900 metres away?</p> <p>11 <b>A. 350 metres from the BdV.</b></p> <p>12 Q. From the BdV?</p> <p>13 <b>A. Yes, 350.</b></p> <p>14 Q. And how far from the CPF?</p> <p>15 <b>A. From the CPF, it is 3 kilometres away, so.</b></p> <p>16 Q. Plus?</p> <p>17 <b>A. 2,650.</b></p> <p>18 Q. How secure a camp was it? Could anyone go in?</p> <p>19 <b>A. No, of course not, no. It was well manned.</b></p> <p>20 Q. Weapons there?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. Do you know what sort of weapons?</p> <p>23 <b>A. I do, yes. There were -- well, assault weapons,</b></p> <p>24 <b>Kalashnikovs, light machineguns, RPG7 rocket launchers,</b></p> <p>25 <b>mortars, 127 millimetre mortars and sniper rifles and</b></p> <p style="text-align: center;">Page 91</p>
<p>1 and get to the camp before the aggressors reach the camp</p> <p>2 yes?</p> <p>3 <b>A. That's correct.</b></p> <p>4 Q. That's a difference of view perhaps but a reasonable</p> <p>5 difference of view between security professionals?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. It may be of course that the captain would also take</p> <p>8 into account what I think nowadays might be called human</p> <p>9 factors issues. For example, it might be thought that</p> <p>10 keeping a guard in a static position in a tower for 10</p> <p>11 to 12 hours a day may make the guard less effective and</p> <p>12 observant than if he was travelling in a patrol with</p> <p>13 colleagues, yes?</p> <p>14 <b>A. Yes, normally they rotate, well you would spend probably</b></p> <p>15 <b>two hours on duty in a tower. That would be the</b></p> <p>16 <b>minimum. There would be a regular rotation.</b></p> <p>17 Q. And then movement around. When I said 10 to 12 hours</p> <p>18 I was referring to the whole shift but for a period of</p> <p>19 time that would be a potential factor?</p> <p>20 <b>A. Mmm.</b></p> <p>21 Q. Now, again, it may be that another security professional</p> <p>22 would take a different view and think, well, it's</p> <p>23 actually all right for them to stay in the guard tower</p> <p>24 for two hours or it may be all right for them to go on</p> <p>25 patrol. I am not suggesting that these were factors</p> <p style="text-align: center;">Page 90</p>	<p>1 <b>grenades obviously.</b></p> <p>2 Q. And presumably all securely stored?</p> <p>3 <b>A. In an armory that we built for them, that's correct.</b></p> <p>4 Q. And it is a substantial camp for that purpose?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. The decision to locate the camp there and not, for</p> <p>7 example, at the BdV or at a point at VCP1 or anywhere</p> <p>8 else was a decision taken by the Gendarmes?</p> <p>9 <b>A. That's correct.</b></p> <p>10 Q. There were Gendarmes at the VCP1 at La Recule and they</p> <p>11 were armed and provided protection as well?</p> <p>12 <b>A. Correct.</b></p> <p>13 Q. How many Gendarmes based there?</p> <p>14 <b>A. There was one Gendarme Nationale who would come down</b></p> <p>15 <b>from In Amenas to control the day-to-day civilian</b></p> <p>16 <b>circulation on the road. There was a group, a group of</b></p> <p>17 <b>10 GLD who were there, they're civilians basically who</b></p> <p>18 <b>were ex-military who now work with the government to</b></p> <p>19 <b>secure remote locations and there was a night detachment</b></p> <p>20 <b>of Gendarmes who went out there which is approximately</b></p> <p>21 <b>12 to 15 Gendarmes who would be there to protect the</b></p> <p>22 <b>whole VCP at La Recule.</b></p> <p>23 Q. Just as you are here and you may be able to help us with</p> <p>24 this, in terms of equipment at La Recule do you know if</p> <p>25 there was a CCTV camera?</p> <p style="text-align: center;">Page 92</p>

23 (Pages 89 to 92)

<p>1 <b>A. No, there wasn't, no.</b></p> <p>2 Q. There wasn't. Was there any sort of log kept there of</p> <p>3 people passing through that checkpoint?</p> <p>4 <b>A. The Gendarmerie Nationale would certainly keep records,</b></p> <p>5 <b>yes.</b></p> <p>6 Q. The Gendarme protected zone extended beyond just the</p> <p>7 camp itself, didn't it, in the security management plan</p> <p>8 and in a different liaison document it says that the</p> <p>9 Gendarmes secured the In Amenas zone from Ohanet to the</p> <p>10 Larache VCP. Just help us with that. They are two</p> <p>11 locations either side of In Amenas?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. The facility?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. We heard from Mr Cobb that they are something like</p> <p>16 60 kilometres away in either direction. Is that about</p> <p>17 right?</p> <p>18 <b>A. The pipeline -- Ohanet would be approximately</b></p> <p>19 <b>100 kilometres to the north and Larache would be</b></p> <p>20 <b>70 kilometres south.</b></p> <p>21 Q. And there were Gendarme camps at either end?</p> <p>22 <b>A. There were at either end, yes, that's correct. There</b></p> <p>23 <b>was a Gendarme detachment at Ohanet and VCPs and a small</b></p> <p>24 <b>detachment at La Recule as well.</b></p> <p>25 Q. And they would also be responsible for patrolling areas</p> <p style="text-align: center;">Page 93</p>	<p>1 Q. And they would be effectively reporting back to you?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. And presumably telling you, and I don't mean you</p> <p>4 personally again, but people within your function the</p> <p>5 patrols are happening or they're not happening or</p> <p>6 they're carrying on in this way?</p> <p>7 <b>A. Yes, that's correct.</b></p> <p>8 Q. After the summer of 2012 their direct reporting line</p> <p>9 went to the ASI and they presumably provided similar</p> <p>10 sort of confirmation to the ASI?</p> <p>11 <b>A. Yes, I presume.</b></p> <p>12 Q. But you continued to have at least a liaison or</p> <p>13 discussion with that person?</p> <p>14 <b>A. The ASI. That's correct, we did.</b></p> <p>15 Q. What about the night time OLC? Did you speak to him --</p> <p>16 <b>A. Yes, because his office was in the same block as we were</b></p> <p>17 <b>so we spoke, if I saw him in the morning before he went</b></p> <p>18 <b>off shift I would have a chat and just ask if everything</b></p> <p>19 <b>was okay, if the everything was peaceful, if the</b></p> <p>20 <b>Gendarmes had been in position as we say.</b></p> <p>21 Q. So again, you continued to have that liaison albeit it</p> <p>22 wasn't a formal liaison?</p> <p>23 <b>A. Nothing official, yes.</b></p> <p>24 Q. And you were positioned in the same building so</p> <p>25 presumably those sorts of discussions would take</p> <p style="text-align: center;">Page 95</p>
<p>1 away from those two camps --</p> <p>2 <b>A. That's correct.</b></p> <p>3 Q. -- and carrying out their patrols in the Gendarme</p> <p>4 protected zone?</p> <p>5 <b>A. That's correct.</b></p> <p>6 Q. So far as the patrols are concerned, you said again in</p> <p>7 your witness statement, it is page 3, that the roadway</p> <p>8 between the CPF and the BdV is not secured from the</p> <p>9 surrounding desert but is subject to continual Gendarme</p> <p>10 security patrols?</p> <p>11 <b>A. That's correct.</b></p> <p>12 Q. Keeping it fairly short. That continued to be your</p> <p>13 understanding all the way up to the time of the attack?</p> <p>14 <b>A. That's correct.</b></p> <p>15 Q. The night time patrols were monitored, if you like, or</p> <p>16 at least observed inasmuch as they could be by the night</p> <p>17 time OLC, you explained. That is the same person who</p> <p>18 occupied that post or people who occupied that post</p> <p>19 before the summer of 2012 who would have been an expat?</p> <p>20 <b>A. Two years previous, previously we had an expat in that</b></p> <p>21 <b>role. That was nationalised to a national OLC and then</b></p> <p>22 <b>that was given over to the new SSI.</b></p> <p>23 Q. So up to the summer of 2012 that person would be part of</p> <p>24 the liaison team?</p> <p>25 <b>A. Up to the summer, yes.</b></p> <p style="text-align: center;">Page 94</p>	<p>1 place --</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. -- on a regular basis. Again, so it is clear, you were</p> <p>4 asked some questions I think by Mr Ritchie about</p> <p>5 documents which would record the drivers who were sent</p> <p>6 out on patrols at different times?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. And particularly at the time of the attack or just</p> <p>9 before. That is documentation which I think you said to</p> <p>10 Ms Gollop was held by the ASI as part of his function?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. Overseeing the SSI and reporting up to Sonatrach?</p> <p>13 <b>A. That's correct.</b></p> <p>14 Q. It is not a JV set of documents as such. It is the ASI</p> <p>15 to Sonatrach --</p> <p>16 <b>A. Yes, this is --</b></p> <p>17 Q. -- documentation?</p> <p>18 <b>A. -- a nightly or a daily 24 hour journey management plan</b></p> <p>19 <b>that would put in place with names, vehicle registration</b></p> <p>20 <b>numbers, missions et cetera backed up by an individual</b></p> <p>21 <b>Ordre de Mission which was an authorisation to leave the</b></p> <p>22 <b>base basically.</b></p> <p>23 Q. But in short it was material that would be held by the</p> <p>24 ASI?</p> <p>25 <b>A. That's correct.</b></p> <p style="text-align: center;">Page 96</p>

24 (Pages 93 to 96)



<p>1 Q. And that side of the function?</p> <p>2 <b>A. That's correct.</b></p> <p>3 Q. You were asked questions about the ability of the</p> <p>4 drivers supplied by the JV to assist the Gendarme to</p> <p>5 drive in emergency situations and the coroner I think</p> <p>6 asked you wouldn't that be potentially quite dangerous</p> <p>7 or difficult. It is right, isn't it, that in fact there</p> <p>8 had been concerns about the ability of people to drive</p> <p>9 in the desert environment and therefore the JV and</p> <p>10 through the liaison team in particular I think ensured</p> <p>11 that the drivers were trained to the highest standards</p> <p>12 for driving in that environment?</p> <p>13 <b>A. That's correct. That was one -- we did organise desert</b></p> <p>14 <b>driving courses for all drivers. That was later</b></p> <p>15 <b>superseded and taken over by the (inaudible) transport</b></p> <p>16 <b>management system. So the HSE department actually took</b></p> <p>17 <b>that on board. We carried out off systemic annual off</b></p> <p>18 <b>road training basically.</b></p> <p>19 Q. And they were trained at that level and continued to be</p> <p>20 trained at that level as far as you are aware?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. You were asked questions about the patrols that actually</p> <p>23 took place at night time or daytime. I think at one</p> <p>24 stage you volunteered that there would be the five cars</p> <p>25 travelling perhaps together. Were you actually aware</p> <p style="text-align: center;">Page 97</p>	<p>1 was taking place fairly swiftly?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. Again, just help us understand the environment. When</p> <p>4 the patrols are taking place and the Gendarmes are in</p> <p>5 their vehicles of course they may leave a point where</p> <p>6 the aggressors end up coming to but when they were at</p> <p>7 that point they would have a view some distance away?</p> <p>8 <b>A. Yes, it is a flat plateau. They would have good</b></p> <p>9 <b>visibility.</b></p> <p>10 Q. Across the desert and that is what you would be</p> <p>11 expecting them to be doing?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. The civilian guards. If we just talk about those for</p> <p>14 a little while. They were trained, you explained, when</p> <p>15 liaison were managing them to the British Standard 7499</p> <p>16 and that was a training course that was provided,</p> <p>17 I think you said, by Mr Morgan?</p> <p>18 <b>A. Yes, Paul, Paul provided the training.</b></p> <p>19 Q. That British Standard is certified for use in Algeria in</p> <p>20 these circumstances, isn't it?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. So it is not just that it is a standard for people</p> <p>23 manning football stadia in England it is a standard</p> <p>24 which would be deemed to be acceptable and appropriate</p> <p>25 for guards in --</p> <p style="text-align: center;">Page 99</p>
<p>1 that all five cars on that patrol would be sort of</p> <p>2 following a line?</p> <p>3 <b>A. Once they leave -- I have seen five vehicles before.</b></p> <p>4 <b>But once they're out in the field it's down to the</b></p> <p>5 <b>escort commander or the patrol night commander to decide</b></p> <p>6 <b>how he wants to arrange his elements.</b></p> <p>7 Q. So we shouldn't proceed on the basis that at all times</p> <p>8 that night time patrol --</p> <p>9 <b>A. No, you shouldn't.</b></p> <p>10 Q. -- involved just five cars?</p> <p>11 <b>A. No, that was an error on my part. No, you shouldn't.</b></p> <p>12 Q. In relation to the speed of response of the night patrol</p> <p>13 to the attack itself one of the points you were raising</p> <p>14 that needed to be understood is whether and if so how</p> <p>15 quickly the night patrol responded to the attack at</p> <p>16 about VCP1, yes?</p> <p>17 <b>A. Yes, VCP1 or the base or whatever.</b></p> <p>18 Q. Because the short point is that even if the patrols were</p> <p>19 some distance away from their patrols from VCP1 at the</p> <p>20 time of the attack they would still only be that</p> <p>21 distance away from that point and presumably there would</p> <p>22 be the facility for them to be alerted certainly by the</p> <p>23 Gendarme who were accompanying the bus?</p> <p>24 <b>A. Most definitely.</b></p> <p>25 Q. And could get to the point of VCP1 or where the attack</p> <p style="text-align: center;">Page 98</p>	<p>1 <b>A. It is a very high standard for Algeria.</b></p> <p>2 Q. -- in Algeria. And those courses were carried out for</p> <p>3 I think in your statement you say for about two years?</p> <p>4 <b>A. Paul carried them for two years. Previous to that it</b></p> <p>5 <b>was other expat instructors who carried out the course</b></p> <p>6 <b>training.</b></p> <p>7 Q. And those courses were not needed to be carried out</p> <p>8 again after SSI took over responsibility for the guards</p> <p>9 in July or so of 2012?</p> <p>10 <b>A. Yes, I believe we were going to be tasked to carry out</b></p> <p>11 <b>the guard training.</b></p> <p>12 Q. But you hadn't actually carried out any guard training?</p> <p>13 <b>A. No, we hadn't.</b></p> <p>14 Q. And it follows from both of those answers doesn't it,</p> <p>15 that there weren't any new guards who had been</p> <p>16 introduced into the set up post July 2012?</p> <p>17 <b>A. No.</b></p> <p>18 Q. So the guards who were from the summer of 2012</p> <p>19 responding or reporting directly to SSI or through SSI</p> <p>20 were the same guards who had been trained and monitored</p> <p>21 by you prior to that period?</p> <p>22 <b>A. That's correct.</b></p> <p>23 Q. So far as vetting is concerned, again, you have</p> <p>24 explained how they were security vetted by the Algerian</p> <p>25 authorities, but in your statement you also said you</p> <p style="text-align: center;">Page 100</p>

<p>1 personally interviewed each of the candidates who were 2 in fact appointed?</p> <p>3 <b>A. Yes, we did. Paul and myself we would assist the HR 4 department, the human resources department, to carry out 5 the interviews.</b></p> <p>6 Q. And presumably when you were interviewing you were 7 looking to assess their abilities and capabilities --</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. -- as access control guards. 10 After the responsibility for the management and 11 control of the guards was passed over to SSI you 12 continued to carry out a monitoring role of the guards 13 but would it be fair to say from a distance, they 14 weren't reporting directly?</p> <p>15 <b>A. Yes, specifically we were tasked to mentor, mentor the 16 group's team leaders as such and the CPF OLC especially 17 was there to monitor the guards carrying out their 18 duties.</b></p> <p>19 Q. But through your role as it developed post summer of 20 2012 you would be in a position to identify problems 21 with the guards and any deficiencies in their 22 performance?</p> <p>23 <b>A. That's correct.</b></p> <p>24 Q. And you did?</p> <p>25 <b>A. Yes, we did, yes.</b></p> <p style="text-align: center;">Page 101</p>	<p>1 department and approved by senior joint venture 2 management. We still work very closely every day with 3 the guards and know them all very well. Initially the 4 transition period was difficult and [I think you meant 5 to say] in my opinion standards dropped. However, now 6 the working relationship has settled down and functions 7 well. As an OLS I now have an adviser and mentoring 8 role to the ASI."</p> <p>9 Would that be a fair summary of the position 10 by January 2013?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. And we will look at Mr Morgan's handover notes to you in 13 which he explains his assessment at this time. But was 14 that as far as you understood it the combined view or 15 assessment of the liaison team of the process as it had 16 become by January 2013?</p> <p>17 <b>A. Yes, it was very difficult and slowly, you know, slowly 18 they began to perform I suspect towards the end.</b></p> <p>19 Q. Were you aware before the handover that the guards 20 didn't always close the gates or always carry out the 21 checks as per their procedures?</p> <p>22 <b>A. There were times certain guards didn't, yes, and 23 I believe they were reprimanded for that.</b></p> <p>24 Q. And the set up was that there was an OLC, part of the 25 liaison team, who was positioned in a building close to</p> <p style="text-align: center;">Page 103</p>
<p>1 Q. The standards post the handover to SSI and how the 2 guards were performing you have actually addressed in 3 your witness statement and just before I remind you of 4 what you said to see if that remains your view, just 5 help us with this: SSI was not a new organisation, was 6 it?</p> <p>7 <b>A. Within Sonatrach? No.</b></p> <p>8 Q. It had been in existence for some time before the 9 handover in 2012?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. And what is it, what is SSI?</p> <p>12 <b>A. SSI is the Surete de Securite Interne of Sonatrach. It 13 is Sonatrach's internal guarding security department.</b></p> <p>14 Q. Internal security department which had been in existence 15 for some time which was then tasked with managing 16 directly the guards who would be Algerian nationals?</p> <p>17 <b>A. Yes, because as you may be aware the guards were 18 actually contractors, back contractors, and they 19 requested to be transferred over to Sonatrach in 20 permanent positions and from that became, the SSI 21 entered into existence in Tiguentourine.</b></p> <p>22 Q. In your statement, and it is page 6 of your April 2013 23 statement, you say about the guards: 24 "They are no longer managed by us but still work to 25 the procedures which were established by the JV liaison</p> <p style="text-align: center;">Page 102</p>	<p>1 the entrance to the BdV, one of whose functions was to 2 monitor the guards?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. And that would involve monitoring whether or not they 5 closed the gates as they should and carried out checks 6 as they should, yes?</p> <p>7 <b>A. That's correct.</b></p> <p>8 Q. Did that person or the person occupying that role 9 continue to carry out that role post the handover?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. The monitoring?</p> <p>12 <b>A. Yes. They attempted to.</b></p> <p>13 Q. But the difference was that certainly after a period of 14 time if they found something that was wrong they weren't 15 going directly to the guards themselves to say, hold on, 16 you've got to tighten up on this, they went to the ASI?</p> <p>17 <b>A. Yes, we were instructed that we could no longer talk 18 directly to the guards we had to go via the ASI.</b></p> <p>19 Q. But the monitoring continued?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. So if, for example, you discovered through that 22 monitoring a marked lack of performance or a drop in 23 standards then you would want to make sure something was 24 done about that?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 104</p>

26 (Pages 101 to 104)

<p>1 Q. And you would action it and take it forward in whatever 2 way was appropriate?</p> <p>3 <b>A. There were a number of occasions when -- there weren't</b> 4 <b>serious breaches et cetera but we did raise this with</b> 5 <b>the ASI at the time.</b></p> <p>6 Q. So far as the physical security measures at the site are 7 concerned, can you just help us with this, because in 8 the course of your evidence you have explained a number 9 of things that happened at different times. I wonder if 10 you might just take up the big photograph of the BdV and 11 just help us insofar as you can, Mr Fitzpatrick, with 12 some of the chronology of the things that developed on 13 the site over time.</p> <p>14 I am just going to suggest broad dates to you for 15 when things were constructed and if they are right say 16 so. If they are wrong say so, please.</p> <p>17 <b>A. Mmm.</b></p> <p>18 Q. Start with just what is called the company camp, top 19 left-hand corner of the complex. Was that constructed 20 around 2004/2005?</p> <p>21 <b>A. Yes, construction began in 2004/2005.</b></p> <p>22 Q. What, the BdV itself, what we have called the BdV which 23 is the central bit where the plaza is and all the 24 central facilities are, around 2006/2007?</p> <p>25 <b>A. I can't remember exactly. Construction started almost</b></p> <p style="text-align: center;">Page 105</p>	<p>1 <b>A. Yes.</b></p> <p>2 Q. The outer gate with the chicane, the concrete barriers 3 on the sides of that chicane?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. The external barrier beyond the chicane which was to act 6 as a stop?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. With the inner gate as the next protection?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. The GTP extension, which is the bit at the bottom left 11 I think it is the GTP fly camp on this, was a bit later, 12 around 2012?</p> <p>13 <b>A. Yes. Basically in line with the beginning of the</b> 14 <b>Compression Project.</b></p> <p>15 Q. And the Compression Project is right-hand side, bottom, 16 and that was again about 2012?</p> <p>17 <b>A. Slightly earlier I think.</b></p> <p>18 Q. When these works at the BdV were constructed when they 19 took place certainly from 05 or thereabouts they were 20 constructed with input from the liaison team?</p> <p>21 <b>A. That's correct.</b></p> <p>22 Q. So the liaison team said "these are security 23 requirements we think should be in place", and those 24 were the things that were required to be done?</p> <p>25 <b>A. The original perimeter fencing wasn't -- we didn't have</b></p> <p style="text-align: center;">Page 107</p>
<p>1 <b>simultaneously with the foundation, but for the</b> 2 <b>buildings themselves, yes, there was certain delays to</b> 3 <b>the schedule, so you may be right.</b></p> <p>4 Q. When that was constructed the double perimeter fence was 5 constructed?</p> <p>6 <b>A. Oh yes, of course. The double perimeter fence was</b> 7 <b>constructed, was the first construction we did, the</b> 8 <b>double perimeter fence.</b></p> <p>9 Q. So around whatever existed at that time the double 10 perimeter fence had been constructed?</p> <p>11 <b>A. That's correct. Before we habited -- accommodated the</b> 12 <b>area the double perimeter fence was in place.</b></p> <p>13 Q. The GTP camp, which is the bottom left-hand corner, 14 around 2007?</p> <p>15 <b>A. Yes, yes.</b></p> <p>16 Q. Above it the extension to the company camp, around 17 2008/2009, yes? Then around the whole perimeter the 18 T bars were put in place, the concrete blocks, 19 substantial things, 3-tonne blocks?</p> <p>20 <b>A. 3-tonne blocks, yes.</b></p> <p>21 Q. All the way around in about 2009/2010?</p> <p>22 <b>A. 2009, that's correct.</b></p> <p>23 Q. And at about the same time the entrance was upgraded and 24 moved to the time where it was at the time of the 25 attack, so around 2010?</p> <p style="text-align: center;">Page 106</p>	<p>1 <b>any design input on that. That came with the contract</b> 2 <b>when BP bought the contract from I believe AMOCO. So</b> 3 <b>the base itself came as a package, if you like. So we</b> 4 <b>didn't design the perimeter fencing or the gates or</b> 5 <b>anything.</b></p> <p>6 Q. Sorry, not the front gates, the outer gates?</p> <p>7 <b>A. The outer gates?</b></p> <p>8 Q. Yes.</p> <p>9 <b>A. No.</b></p> <p>10 Q. Who designed the outer gates?</p> <p>11 <b>A. That was I believe the --</b></p> <p>12 Q. The contractors who came to --</p> <p>13 <b>A. No, no, it was already, before they started construction</b> 14 <b>it was already designed. Liaison had no input on the</b> 15 <b>design phase.</b></p> <p>16 Q. So when you are talking about the outer gate there you 17 are referring to the gate at the entryway which 18 I thought you agreed with me was constructed about 2010?</p> <p>19 <b>A. Sorry, no, that was constructed, sorry, that was</b> 20 <b>constructed, as was the inner gate, both of these gates</b> 21 <b>were constructed in line with the physical security of</b> 22 <b>the base.</b></p> <p>23 Q. I see. What was different in 2009/2010 was the 24 construction of the chicane --</p> <p>25 <b>A. The chicane.</b></p> <p style="text-align: center;">Page 108</p>

1 Q. -- and the concrete barriers?  
 2 **A. Yes, the lateral protection for the chicane and the**  
 3 **concrete barriers around the perimeter.**  
 4 Q. T bars? Were they something recommended by the liaison  
 5 team?  
 6 **A. Yes, they were.**  
 7 Q. And they were then constructed?  
 8 **A. Yes.**  
 9 Q. So far as the T bars are concerned, that was  
 10 a substantial construction project, wasn't it?  
 11 **A. Yes.**  
 12 Q. You were having to ship in, bring in 3-tonne barriers of  
 13 concrete --  
 14 **A. Yes.**  
 15 Q. -- into the desert at a cost of some millions of pounds?  
 16 **A. Yes.**  
 17 Q. Now, after that construction took place, so we have the  
 18 double perimeter fencing, then the T bars being put in,  
 19 then the chicane and the external barrier across the  
 20 chicane, we have got the two gates at the BdV all the  
 21 way through, we then have perimeter lighting installed?  
 22 **A. That was already installed initially.**  
 23 Q. Improved CCTV?  
 24 **A. Yes, we upgraded the CCTV system as well.**  
 25 Q. So we understand the CCTV, one of the things you

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1 upgraded or required to be done and was done was to  
 2 effectively ensure there were sufficient cameras  
 3 positioned in such a way that they would be seeing out  
 4 of the camp in the same way as somebody standing in the  
 5 guard tower would be able to see?  
 6 **A. Yes, that's correct. We had pan tilt zoom cameras**  
 7 **within the base.**  
 8 Q. Which in a sense could be said to be perhaps even better  
 9 than somebody standing in the guard tower so far as  
 10 observation is concerned because the operator could  
 11 manipulate the camera to really zoom on something?  
 12 **A. Which they did.**  
 13 Q. And that would be observed 24 hours a day?  
 14 **A. 24 hours a day.**  
 15 Q. And then the motion detector alarms were put in?  
 16 **A. The CCTV -- the motion detector sensors are incorporated**  
 17 **into the same system.**  
 18 THE CORONER: Did you take the view that that did mean there  
 19 was no need for anybody else in the guard towers or not?  
 20 **A. No, I would have always liked to have seen Gendarmes in**  
 21 **the guard towers.**  
 22 THE CORONER: Just because? Spell it out.  
 23 **A. Just that additional level of security I suspect. Armed**  
 24 **security, armed professionals out there.**  
 25 MR POPAT: When I asked you about the Gendarmes before in

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1 the guard towers I suggested two things might have been  
 2 potential benefits, one is obviously the ability of  
 3 somebody to observe from the guard towers but the other  
 4 was having an armed presence closer to the site.  
 5 **A. Yes.**  
 6 Q. The second of those would still be a benefit and an  
 7 advantage even if you had somebody being able to monitor  
 8 from the CCTVs?  
 9 **A. Yes, I think it would, yes.**  
 10 Q. The upgrades that were recommended by liaison continued  
 11 to be recommended over a period of time, there were  
 12 different things that were recommended, different things  
 13 that were done, the T bars, the CCTV, the motion sensors  
 14 and so on. But other things were also recommended?  
 15 **A. That's correct.**  
 16 Q. And some of which weren't done. One of those was the  
 17 fitting of concrete sills to the base of the perimeter  
 18 fence. Just so we understand the thinking behind that,  
 19 the fitting of those sills would make the base of the  
 20 fence sturdier and provide protection against somebody  
 21 tunnelling under the fence?  
 22 **A. Under the fence, yes.**  
 23 Q. They don't provide any particular additional protection  
 24 against somebody breaking through the fence?  
 25 **A. No.**

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1 Q. Because the fence remains in place and after the T bars  
 2 were installed the T bars provided far greater  
 3 protection against somebody ramming a vehicle through  
 4 into the fence?  
 5 **A. Most definitely.**  
 6 Q. Two other measures you have mentioned. One was  
 7 motorized gates and so we understand that, they were  
 8 going to be electronic gates which replaced the two  
 9 gates that we have seen in the photographs, the outer  
 10 and the inner?  
 11 **A. Yes, all entrances hopefully would have been covered by**  
 12 **two individual motorized sliding gates.**  
 13 Q. And the main potential advantage of the motorized gates  
 14 was that they could be operated electronically and  
 15 therefore closed more quickly?  
 16 **A. Yes.**  
 17 Q. And that was what was behind your recommendation?  
 18 **A. That and -- well the fact that it is additional**  
 19 **security.**  
 20 Q. Of course, and that is going to security, isn't it?  
 21 **A. It is, it is additional security.**  
 22 THE CORONER: And you wanted -- and what you envisaged was  
 23 stronger gates in any event.  
 24 **A. Stronger gates more impact resistant. That's correct.**  
 25 MR POPAT: I think at one stage you said -- I'm not sure

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1 whether you said crash proof or impact proof.  
 2 **A. Yes.**  
 3 Q. Something that was going to be sturdier than the gates  
 4 that were there at the time?  
 5 **A. Yes.**  
 6 Q. Those gates that were there at the time, however, were  
 7 not gates made with chicken wire or sort of flimsy gates  
 8 that were not heavy?  
 9 **A. No, they were heavy gates. They needed some, you know,**  
 10 **physical effort to open and close, yes but they were**  
 11 **made -- they were chicken wire inside them basically.**  
 12 Q. They were --  
 13 **A. There was a very heavy framework.**  
 14 Q. -- you can see it in the photographs, perimeter to the  
 15 fence.  
 16 **A. Yes, it was.**  
 17 Q. And I think somewhere in your evidence you said that  
 18 they were heavy and required some force to be closed?  
 19 **A. Yes.**  
 20 Q. In your evidence you also recommended, you referred to  
 21 a recommendation about the installation of an automatic  
 22 intermittent alarm at the CPF?  
 23 **A. That was already -- it wasn't erected but it had already**  
 24 **been purchased, it was already there at the CPF waiting**  
 25 **for installation.**

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1 Q. But again, that was another recommendation that had been  
 2 made and in fact that was actioned or being actioned?  
 3 **A. Yes.**  
 4 Q. But it certainly wasn't in place at the time of the  
 5 attack?  
 6 **A. No.**  
 7 Q. Now, these sorts of things that were recommended over  
 8 time were recommended as upgrades to the security  
 9 environment at the camp?  
 10 **A. Physical security upgrades. That's how we described**  
 11 **them.**  
 12 Q. They would, in your view, have provided additional or  
 13 improved security in some respects --  
 14 **A. That's correct.**  
 15 Q. -- in the ways we have discussed. But at no stage did  
 16 you or the liaison team take the view that the absence  
 17 of those upgrades created such a serious risk to the  
 18 security or safety of anyone in the camp that they  
 19 couldn't be in the camp for example?  
 20 **A. No.**  
 21 Q. We can see it perhaps most clearly in the security  
 22 review which is in the core bundle which is a green  
 23 bundle. You can probably put that red one aside,  
 24 Mr Fitzpatrick. Divider 4. This is the security review  
 25 for Quarter 2 in 2012 produced by the liaison manager,

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1 your line manager, dated June 2012. If you just turn to  
 2 page 16, bottom of that page, the heading "Second  
 3 quarter 2012, physical security measures" and what the  
 4 author has said is that:  
 5 "During the course of conducting review and  
 6 assessing physical security measures it is noted that  
 7 certain upgrade items have been on the tracking sheets  
 8 for significant period of times. This review concluded  
 9 it would be beneficial to conduct a joint IA management  
 10 OLS review and clarify present security upgrade work."  
 11 I don't read on as it is all clear what is being  
 12 said. So what the author did was to then go through  
 13 different security measures, there are some attachments  
 14 to this document. If you turn over the page and just  
 15 look at the bottom of page 3, so it is seen in its full  
 16 context, it has identified the upgrade measures.  
 17 Summary:  
 18 "Physical security measures in place are adequate  
 19 but outstanding items of longstanding remain to be  
 20 addressed and upgraded to meet the minimum standards."  
 21 If you go over the page.  
 22 THE CORONER: Sorry, can you just help me with that?  
 23 MR POPAT: I am sorry.  
 24 THE CORONER: Maybe it is going to be to become plain but is  
 25 that rather suggesting that in fact they are not meeting

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1 the minimum standards, is that your understanding at the  
 2 present time? Maybe it is going to become plain over  
 3 the page. I don't know. Mr Fitzpatrick?  
 4 **A. Sorry, sir?**  
 5 THE CORONER: Just looking at the bottom of that page it  
 6 says "outstanding items of longstanding remain to be  
 7 addressed and upgraded to meet the minimum standards."  
 8 On the face of it rather suggesting that they are  
 9 not at the moment or is that --  
 10 **A. I haven't seen this document, this email before, but**  
 11 **I can -- you know, so I don't really think I can comment**  
 12 **on this.**  
 13 MR POPAT: Sir, I think Mr Butt was the author but he was  
 14 a back-to-back with Mr Wigg so maybe we will get  
 15 clarification from Mr Wigg.  
 16 THE CORONER: Yes.  
 17 MR POPAT: I wanted to make sure that the full context was  
 18 given to Mr Fitzpatrick. You see at the bottom there,  
 19 over the page it says:  
 20 "The majority of these items are upgrades that were  
 21 identified to meet changing and evolving risks and were  
 22 identified post initial construction. Retrofitting and  
 23 upgrade is obviously more complicated and costly than if  
 24 it is included and designed in the original construction  
 25 plans."

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<p>1 I am not going to read the rest of the paragraph but 2 if I summarise it as what is being said is: look, if you 3 involve the liaison team in the design of the thing it's 4 better because it would mean that you don't have to add 5 things on? 6 <b>A. Yes, it's more cost-effective, yes, certainly.</b> 7 Q. And then the next sentence after that paragraph: 8 "The above point added to emphasise the advantages 9 in including the site liaison team." 10 And then this: 11 "The current physical security measures in place are 12 sufficient but require some of the outstanding items to 13 be assessed and addressed. The current set of security 14 procedures and protocols in conjunction with the 15 protection and deterrent provided by the site Gendarme 16 detachment are proportional to the current security 17 situation and climate and adequately mitigate the 18 identified risks." 19 Does that accord with your understanding and 20 assessment at the time? 21 <b>A. Yes, yes.</b> 22 Q. That didn't change at any point before January 2013? 23 <b>A. No, it didn't.</b> 24 Q. Thank you. The next section I am just going to deal 25 with fairly quickly, I am afraid time doesn't permit</p> <p style="text-align: center;">Page 117</p>	<p>1 a regular basis the In Amenas camp? 2 <b>A. Yes.</b> 3 Q. And you were aware of the actions undertaken by the 4 military over many years in the time up to the attack 5 where they had seized terrorists and weapons at the 6 border and in the military zone. In other words, 7 military successes? 8 <b>A. There were a large number of military successes.</b> 9 Q. And you were aware from your liaison with the military 10 and the Gendarmes media reports, intelligence 11 gatherings, own observations, at least in broad terms of 12 the size and the type of equipment that was held by the 13 military? 14 <b>A. Yes.</b> 15 Q. You didn't carry out nor could you carry out an audit 16 whereby you checked exactly how many troop members were 17 present and so on? 18 <b>A. No, we couldn't.</b> 19 Q. But would it be right to say from your assessment of the 20 performance of the military at the border and in the 21 zones you did expect whilst it could not be guaranteed 22 that the military would stop or at least spot a group of 23 30 or 40 terrorists driving 4 by 4s through the desert 24 carrying a stash of heavy weaponry? 25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 119</p>
<p>1 examination of this in any detail with you, 2 Mr Fitzpatrick. You have explained the military 3 security rings, border troops and then the military zone 4 and then the Gendarme protected zone. Just so we 5 understand the military zone, as opposed to the border 6 patrols, you said you weren't aware of exactly how that 7 was protected by the military? 8 <b>A. No.</b> 9 Q. Were you aware of checkpoints and the like? 10 <b>A. Oh yes, of course, yes.</b> 11 Q. And were you aware of the presence of troops in that 12 area? 13 <b>A. Yes, I saw a great number of troop movements, convoys</b> 14 <b>basically, mostly.</b> 15 Q. You said that the border and the military zone were 16 porous at one stage in the course of your evidence. And 17 would it be correct to say that by that you meant it 18 could not guarantee or you could not guarantee that 19 people with bad intentions would be picked up either at 20 the border or in the military protected zone. You 21 couldn't guarantee that? 22 <b>A. No, I don't think so.</b> 23 Q. But you were aware of the military capabilities and you 24 liaised obviously with the Gendarmes and occasionally 25 with the military and the military would visit on</p> <p style="text-align: center;">Page 118</p>	<p>1 Q. You didn't regard the Algerian military as a sort of 2 small, poorly trained ill-disciplined force carrying 3 unsophisticated weaponry and the like? 4 <b>A. No, but they're not at the level of NATO as such, but</b> 5 <b>they are professionals.</b> 6 Q. So far as a Gendarme protected zone is concerned, again, 7 there would be checkpoints throughout that zone at 8 different points. We have obviously looked at La 9 Recule, the one closest perhaps to the location but 10 there were other checkpoints patrolled and secured by 11 the Gendarmerie? 12 <b>A. That's correct.</b> 13 Q. They had mobile patrols again throughout that zone not 14 just in the In Amenas facility region but elsewhere? 15 <b>A. That's correct.</b> 16 Q. Through these different measures the liaison team 17 monitored as it was required to do the risks to the 18 security of people at the In Amenas facility, is that 19 right? 20 <b>A. Monitored the security?</b> 21 Q. Monitored the risks to the -- 22 <b>A. The risks, certainly, yes.</b> 23 Q. And help us with this. The risks to security could 24 arise in any number of ways, couldn't they? One way 25 potentially is, for example, a reduction in the security</p> <p style="text-align: center;">Page 120</p>

<p>1 protection provided for the people at In Amenas because                  2 of, for example, a reduction in the security afforded by                  3 the Gendarmes or the military, yes?                  4 <b>A. Yes.</b>                  5 Q. So a reduction in the security provided by them because                  6 they have reduced their numbers or reduced the type of                  7 equipment they carry or reduced the quality of recruits                  8 might create a risk to the security of people at                  9 In Amenas?                  10 <b>A. Yes.</b>                  11 Q. And that could be an indicator that people or a signal                  12 that people at In Amenas could be less secure?                  13 <b>A. That's correct.</b>                  14 Q. Was there any indicator or signal to you or any of the                  15 other security professionals within the liaison team                  16 that there was an increased risk to the safety and                  17 security of people at In Amenas because of a decrease or                  18 worsening of the security provision provided by the                  19 military or the Gendarmes?                  20 <b>A. No, certainly not.</b>                  21 Q. Another way in which security of the people at In Amenas                  22 might be reduced is if there was a reduction in the                  23 physical security provided for their protection at the                  24 facility. So, for example, physical changes taking away                  25 T bars or taking away double perimeter fences and the</p> <p style="text-align: center;">Page 121</p>	<p>1 <b>A. No.</b>                  2 Q. And that was a view shared by everyone within the                  3 liaison team?                  4 <b>A. Yes, I believe.</b>                  5 Q. As far as you knew. A view shared by the Gendarmes?                  6 <b>A. Certainly by the Gendarmes. They assured us that we</b>                  7 <b>worked in a completely safe and secure environment.</b>                  8 Q. And from any other sources that were looked at about                  9 information about security risks was that the same view                  10 as far as you were able to tell?                  11 <b>A. Yes.</b>                  12 Q. If there had been any assessment of risk to the security                  13 of people at In Amenas which suggested there was there                  14 was an increase in the risk to them would you have                  15 required additional control measures to be put in place?                  16 <b>A. Yes, we would.</b>                  17 Q. Perhaps going as far as taking everyone off-site if that                  18 was the appropriate measure?                  19 <b>A. Yes, we would.</b>                  20 THE CORONER: Mr Popat, if you are going to look at                  21 a particular document we might break off there.                  22 MR POPAT: Yes.                  23 THE CORONER: What I think we are going to have to do                  24 because I think, as everybody knows, we have got                  25 witnesses who have flights booked, including you,</p> <p style="text-align: center;">Page 123</p>
<p>1 like could lead to an increase to the risk to the safety                  2 of people within the camp?                  3 <b>A. Yes.</b>                  4 Q. Again, did anything of that sort occur at In Amenas so                  5 that there was an increased risk because of a reduction                  6 in the physical security?                  7 <b>A. No, there was no physical security reductions.</b>                  8 Q. Another way of course that the risks could be assessed                  9 to be increased is if there was a greater risk of                  10 attack. So in other words security protection stays the                  11 same, physical security stays the same or even gets                  12 better but the risk or threat of attack becomes even                  13 greater, yes? And that could happen, for example, civil                  14 unrest or civil war of course?                  15 <b>A. Mmm.</b>                  16 Q. But the threat level could also rise if there was                  17 a greater terrorist activity or more focused activity                  18 against locations such as that at In Amenas, yes?                  19 <b>A. That's correct.</b>                  20 Q. We will look at your assessments in a moment but by                  21 16 January 2013 was there any indicator or signal to you                  22 or the liaison team that there was a greater threat of                  23 attack against the people within In Amenas because of                  24 activity going on in the areas nearby or more widely in                  25 the Sahel region?</p> <p style="text-align: center;">Page 122</p>	<p>1 tomorrow. So we'll start again at 2 o'clock. We can go                  2 on until 5.30 or so or just a little bit after that if                  3 we have a break in the afternoon. I appreciate that                  4 will be a long day for everybody for which I apologise                  5 but it is not going to be a long week because of other                  6 commitments of mine which I can't avoid. In the short                  7 time before we resume please can I ask all advocates                  8 just to check that they are only going to be covering                  9 essential topics that haven't already been covered.                  10 We'll have something in the order of 3 and a half hours                  11 available to us this afternoon. Provisionally one way                  12 of dividing that up that just about works is this, and                  13 I appreciate, Mr Popat, that fairness demands that you                  14 don't get squeezed because you are always at the end,                  15 I am mindful of that.                  16 MR POPAT: Sir.                  17 THE CORONER: But one way it would work is, and I will just                  18 leave this with you all, but, Mr Popat, if you were in                  19 the order of a further half an hour with this witness,                  20 so far as Mr Wiggs is concerned, Ms Dolan I think thinks                  21 she will be half an hour in chief or asking questions on                  22 my behalf. If Mr Ritchie and Mr Owen-Thomas and                  23 Ms Gerry and Ms Gollop were 15 minutes each rather than                  24 20, Mr Flinn was the 10 minutes that you have asked for,                  25 that would be an hour and a ten minutes of questioning.</p> <p style="text-align: center;">Page 124</p>

<p>1 I appreciate there is some difference but there is 2 a community of interests in some occasions between the 3 families. 4 Mr Popat, you have asked for 30 minutes. That would 5 mean Mr Wiggs in 2-hours 10 minutes. Mr Lord, Ms Dolan 6 I think thinks she is going to be five minutes asking 7 questions on my behalf. Mr Ritchie, ten minutes, 8 Mr Owen-Thomas and Mr Popat, if you are 15 minutes 9 rather than 20 each that will make 45 minutes. All of 10 that just about works out. 11 I appreciate it is very tight but I say this to 12 everyone. I found all the questioning helpful. 13 I genuinely have. Inevitably when one looks back over 14 it there are things that have got covered again. I am 15 not being remotely critical and sometimes there is a bit 16 of a run up to a point that we may just have to go 17 straight to. 18 But can I leave that proposal with you just to see 19 if we can work that out this afternoon. 2 o'clock. 20 (1.17 pm) 21 (Luncheon Adjournment) 22 (2.00 pm) 23 MR POPAT: Mr Fitzpatrick, you had explained just before the 24 lunch break the overall assessments undertaken by the 25 liaison team and other security professionals and</p> <p style="text-align: center;">Page 125</p>	<p>1 material about events or security protections that had 2 been put in place, yes? 3 <b>A. That's correct.</b> 4 Q. And all of that information was used to inform the 5 assessments undertaken by the liaison team and recorded 6 in the various documents that you provided to the JV; is 7 that right? 8 <b>A. That's right.</b> 9 Q. Let's just understand, because you were taken to these 10 fairly quickly and to make sure we have understood 11 exactly what was produced by the liaison team and who it 12 was provided to if we can do that. 13 For this purpose you can put away the green bundle 14 and take up, please, the black file which is just on the 15 edge of your desk which is the exhibit to Mr Johnston's 16 witness statement. So these materials are in a number 17 of places, the odd document and so on is in different 18 places but in this file I think we have the bulk of all 19 the relevant material. 20 First, there were weekly assessments undertaken by 21 the liaison team at Hassi Messaoud; is that right? 22 <b>A. Weekly assessments at Hassi Messaoud?</b> 23 Q. Yes? 24 <b>A. I never worked at Hassi Messaoud so I can't confirm</b> 25 <b>that.</b></p> <p style="text-align: center;">Page 127</p>
<p>1 everyone else involved in providing information to you 2 about the security situation at In Amenas. 3 I just want to cover with you, please, the basis for 4 the assessments that were undertaken by the liaison team 5 in particular as to the level of risk at In Amenas and 6 the measures that needed to be undertaken to provide an 7 adequate level of protection, yes? 8 Those assessments included assessments of the 9 physical security of the premises, and by that I mean 10 actual physical checks of fences, gates, barriers, 11 checkpoints and the like; is that right? 12 <b>A. That's correct.</b> 13 Q. Was that carried out by the liaison team personnel all 14 the way through even after July 2012? 15 <b>A. Yes, yes.</b> 16 Q. And liaison team personnel would physically go out and 17 check these things to make sure they were as secure as 18 they needed to be? 19 <b>A. Mmm.</b> 20 Q. It included, as you have already explained, daily, or at 21 least very, very regular liaison with the Gendarmes and 22 the Gendarme captain and far more occasionally with the 23 military as well. It included carrying out intelligence 24 assessments based on announcements by the Algerian 25 government, reviewing open source information or</p> <p style="text-align: center;">Page 126</p>	<p>1 Q. But you were aware of what they produced, is that right? 2 <b>A. Erm.</b> 3 Q. If I just show you to make it easier. 4 <b>A. Please show me.</b> 5 Q. If you turn in that file to page 65. They are in 6 different places, but the you see there page 65, 7 a document marked up "HMD liaison update", 6 January 8 2012, just so everybody understands the pages we have in 9 this document I think someone has redacted from these 10 pages material relating to other sites that were being 11 reported on by Hassi Messaoud, which is why you appear 12 to have a number of blank pages, there were things set 13 out in those pages but not copied through. 14 This is what is called a liaison update produced by 15 Hassi Messaoud and that would be the Algeria liaison 16 managers there? 17 <b>A. Yes.</b> 18 Q. Who would be Mr Wigg and Mr Butt at the time, part of 19 the liaison team who produced these updates on a weekly 20 basis, yes? And that carried on all the way through. 21 We have started in this file from January 2012 but they 22 carried on much before 2012 and all the way up to 2013, 23 yes? I am just going to take you, not to look at any of 24 these in any detail, but just so we can understand the 25 sort of things that it contained in them, to one or two</p> <p style="text-align: center;">Page 128</p>

32 (Pages 125 to 128)



<p>1 of them. If you turn, please, to page 76?</p> <p>2 <b>A. Yes.</b></p> <p>3 <b>Q.</b> This is an update for 1 July 2012 and the authors there</p> <p>4 have recorded an incident which is the suicide bombing</p> <p>5 at Ourgla. What happened, what it's reported was -- how</p> <p>6 it is reported the incident occurred. A young Algerian</p> <p>7 man, an inhabitant of Ourgla, how he died in the attack</p> <p>8 and then an explanation of what is understood by the</p> <p>9 authors as to why this occurred, yes.</p> <p>10 Then below that we see a report of that in fact was</p> <p>11 contained in the newspapers in June 2012 that the</p> <p>12 infamous Algerian terrorist Mokhtar Belmokhtar had been</p> <p>13 killed in fighting near Mali?</p> <p>14 <b>A. Yes.</b></p> <p>15 <b>Q.</b> That is the sort of information that would be contained</p> <p>16 in these updates and recorded on a regular basis. If we</p> <p>17 turn, please, just to page 88 we see there one</p> <p>18 for August 2012 where there is a record of security</p> <p>19 forces announcing the arrest of three high ranking</p> <p>20 terrorists who had been travelling in a 4 by 4 vehicle</p> <p>21 that was stopped at the checkpoint.</p> <p>22 So an example of what might be called a security</p> <p>23 success and there are many others, Mr Fitzpatrick, I am</p> <p>24 not trying to minimise the work that was done to put</p> <p>25 these things together but we don't have the time to go</p> <p style="text-align: center;">Page 129</p>	<p>1 major security incidents reported this week that</p> <p>2 directly that directly or indirectly impact JV</p> <p>3 operations".</p> <p>4 So these were produced by the liaison team AFMC</p> <p>5 people at Hassi Messaoud, provided to the JV and</p> <p>6 recorded incidents, things that might affect the</p> <p>7 security situation at In Amenas.</p> <p>8 In addition to these assessments produced by the</p> <p>9 liaison team at Hassi Messaoud you produced weekly</p> <p>10 assessments as well?</p> <p>11 <b>A. That's correct.</b></p> <p>12 <b>Q.</b> And by that I do mean you personally with Mr Morgan?</p> <p>13 <b>A. That's correct.</b></p> <p>14 <b>Q.</b> We see these from page 116 onwards in the bundle. Just</p> <p>15 to get an idea of the sort of things that were contained</p> <p>16 in these. 116 is the first one in the bundle,</p> <p>17 January 2012. It sets out details of protection zone</p> <p>18 timings under the second heading "In Amenas", "Due to</p> <p>19 the unrest in Libya all department heads are asked to</p> <p>20 remind staff and subcontractors of the importance of</p> <p>21 vigilance when working in the field."</p> <p>22 Then lots of information about different things and</p> <p>23 if you turn over the page this format is followed, it</p> <p>24 seems in most of these weekly updates. A report of</p> <p>25 security incidents in the north and the south. And here</p> <p style="text-align: center;">Page 131</p>
<p>1 through all of these.</p> <p>2 <b>A. Yes.</b></p> <p>3 <b>Q.</b> But then also they recorded things where there were</p> <p>4 perhaps complaints about the security situation and</p> <p>5 things that weren't being done as well as they could be,</p> <p>6 is that right?</p> <p>7 <b>A. Yes.</b></p> <p>8 <b>Q.</b> If you turn, please, to page 93 we see there under the</p> <p>9 heading "in Amenas" second bullet point:</p> <p>10 "Captain still feels that the guards are not</p> <p>11 performing access control effectively. Military have</p> <p>12 officially complained to the project now. MC [I think</p> <p>13 that is Mark Cobb] informed. LB [that is Lotfi</p> <p>14 Benadouda] to speak to the ASIs."</p> <p>15 <b>A. Yes.</b></p> <p>16 <b>Q.</b> We have heard about this from Mr Cobb as well. The</p> <p>17 guards weren't doing everything they should be and there</p> <p>18 had been a complaint. But that thing is also assessed</p> <p>19 and recorded and identified in these materials?</p> <p>20 <b>A. Yes.</b></p> <p>21 <b>Q.</b> As I say, I am not going to take you to all of these.</p> <p>22 They carried on all the way up to the date of the</p> <p>23 incident and the last one I think just before the</p> <p>24 incident was towards the end of December, at least that</p> <p>25 is the last one we have in the bundle, page 114, "no</p> <p style="text-align: center;">Page 130</p>	<p>1 we see a report of the Algerian army destroying a 4 by 4</p> <p>2 vehicle with five terrorists on board, yes?</p> <p>3 <b>A. That's correct.</b></p> <p>4 <b>Q.</b> And that format was followed all the way through and</p> <p>5 recorded this sort of information and the threat levels</p> <p>6 at which people were working to and any other</p> <p>7 information that was deemed to be relevant to assess</p> <p>8 security.</p> <p>9 I am not going to go through each of these because</p> <p>10 time doesn't permit. May I just give some references to</p> <p>11 some pages which might warrant greater attention.</p> <p>12 Page 129, 141, 163, 166, 189, 192 and then perhaps if we</p> <p>13 just look, please, at 214 together, Mr Fitzpatrick.</p> <p>14 <b>A. Yes.</b></p> <p>15 <b>Q.</b> This is moving into September 2012. Another report,</p> <p>16 this time in relation to the south, of a foiling by the</p> <p>17 Armed Forces of an attempt to smuggle weapons from Libya</p> <p>18 and details of what they had done?</p> <p>19 <b>A. Mmm.</b></p> <p>20 <b>Q.</b> And also these reports included information about</p> <p>21 information you had received or obtained about troop</p> <p>22 levels in different places, didn't they? If we take</p> <p>23 page 232, please, bottom of that page:</p> <p>24 "Algeria reinforces southern borders with 35,000</p> <p>25 troops ahead of a possible west African military</p> <p style="text-align: center;">Page 132</p>

33 (Pages 129 to 132)

<p>1 intervention in northern Mali. Algerian authorities are  2 reinforcing security along the country's southern  3 borders. The move comes as the international community  4 prepares a response to the Mali crisis."  5 You obviously remember these documents, being the  6 author at least of some of them?  7 <b>A. Yes.</b>  8 <b>Q.</b> In summary, it is fair to say that they recorded all  9 information that you had been able to obtain about  10 terrorist incidents, military activity?  11 <b>A. Mmm.</b>  12 <b>Q.</b> Included at least an indirect assessment of the  13 performance of the military and the Gendarmes in foiling  14 security risks and terrorist attacks, yes?  15 <b>A. That's correct.</b>  16 <b>Q.</b> And where appropriate included recommendations or  17 instructions such as maintaining vigilance and the like.  18 In addition to the weekly reports that were produced  19 by Hassi Messaoud and the In Amenas liaison team  20 internal monthly updates were produced for the liaison  21 team, weren't they?  22 <b>A. That's correct.</b>  23 <b>Q.</b> Again, if we turn, please, to page 243 these were  24 monthly updates, not supplied to the JV but supplied  25 within the liaison team to inform each of you about  Page 133</p>	<p>1 significant detail about events and incidents that have  2 occurred?  3 <b>A. That's correct.</b>  4 <b>Q.</b> In addition to those assessments undertaken on a weekly  5 and a monthly basis by liaison BP actually volunteered  6 information itself, didn't it?  7 <b>A. Yes.</b>  8 <b>Q.</b> And it provided what was described I think as a weekly  9 summary of risks put together by its Algeria office or  10 Algerian liaison team and that was supplied to the  11 liaison team working at the JV to provide it with  12 information that BP had managed to gather?  13 <b>A. Mmm.</b>  14 <b>Q.</b> Again, if we just look at page 299 you will see the  15 first in the bundle. It runs to many pages. It  16 includes reports of information contained in newspaper  17 reports and other media sources and other information  18 that has been obtained from other sources that another  19 witness will be able to describe.  20 But in essence, it was an additional resource  21 supplied by BP to the JV liaison team to inform it of  22 whatever BP had been able to gather about intelligence  23 risks?  24 <b>A. Yes, we do use this for our security base as well.</b>  25 <b>Q.</b> So those assessments were undertaken on a weekly and  Page 135</p>
<p>1 other information that might have arisen or been  2 obtained?  3 <b>A. Yes.</b>  4 <b>Q.</b> We see in this one at the top internal document, the  5 object of which is to keep the JV liaison team regularly  6 updated on specific information relative to liaison  7 procedures and military protection on all sites.  8 Updated monthly and available on request.  9 Then just to get an idea of the format of this  10 document, again, a summary of events in the north and  11 the south and then below that main points that are  12 relevant which include tool box talks held on a regular  13 basis with guards on access control and with guards on  14 security procedures and with drivers on journey  15 management and so on.  16 Where it says about six lines down from that second  17 holepunch:  18 "Meetings are held on a regular basis with military  19 at all locations by the liaison rep on site."  20 That is referring in fact to the Gendarmes?  21 <b>A. Yes, it is. In the case of In Amenas it is the</b>  22 <b>Gendarmes.</b>  23 <b>Q.</b> Thank you. We won't go through the other monthly  24 updates but they are in the bundle and again, they  25 follow a similar format with detail and sometimes quite  Page 134</p>	<p>1 a monthly basis, plus the BP assessments carried out and  2 the liaison team supplied to the JV security reviews on  3 what by this time I think had become a six monthly  4 basis, is that right?  5 <b>A. Security reviews?</b>  6 <b>Q.</b> Yes. Let me just show you where they are. You can put  7 that file away now. It is a document we looked at  8 before in the green bundle. Tab 4.  9 <b>A. Okay, yes.</b>  10 <b>Q.</b> This is the Quarter 2 of 2012 security review. We see  11 its title in the subject heading, five lines from the  12 top. "Internal security review." And then what it then  13 proceeds to do is set out a security overview of the  14 region which includes incidents and events that have  15 occurred, evolving risks, and then, and just taking by  16 way of example, on page 15, an assessment undertaken by  17 the authors of the review. This one says the next to  18 the second holepunch:  19 "To date despite the closeness of the In Amenas  20 project site to the Libyan border and the risks of  21 smuggled Libyan weapons being used by AQIM groups in the  22 southern region there have been no signs of an increase  23 in incidents or activity in the project site region.  24 Despite the lack of evidence, firm indicators or  25 specific incidents the potential for smuggled arms to be  Page 136</p>

<p>1 used in criminal terrorist activity this threat will                  2 remain inherent risk for the immediate future and                  3 particularly concerning the threat to aviation from the                  4 use of MANPADS. The IA JV site military who are                  5 a proven indicator of change in the security situation                  6 have not altered their standard operating procedures.                  7 All site security measures and their security stance                  8 remains unchanged."                  9 So a review carried out by the liaison team, I think                  10 this in fact by the liaison manager at Hassi Messaoud?                  11 <b>A. That's correct.</b>                  12 Q. With an assessment of overall what that risk remains at                  13 for the JV?                  14 <b>A. Mmm.</b>                  15 Q. I won't take you through all of this again. Time                  16 doesn't permit, but if you just glance at the last                  17 sentence of the next paragraph which talks about the                  18 conflict in Mali:                  19 "To date as the conflict develops refugee and rebel                  20 displacements to camp locations on the border have been                  21 reported but there has not been an increase or pattern                  22 of incidents that demonstrates the situation in the                  23 southern region has changed for the worse."                  24 Just over the page, the last paragraph above the                  25 heading "IA SH SSI implementation" it says that the                  Page 137</p>	<p>1 overview produced by the liaison team, isn't it?                  2 <b>A. Yes.</b>                  3 Q. And we don't need to look at too much in this but you                  4 see under the heading "General":                  5 "The general security situation in In Amenas has                  6 remained largely unchanged since the last internal                  7 security review and there have been no significant                  8 security incidents that have directly impacted project                  9 operations."                  10 Then reference made to the incidents at Ourgla.                  11 That is the one that's mentioned there.                  12 Again, when looking at the -- I will just do this                  13 very shortly, but if you turn over the page this is                  14 under the heading "SSI", second paragraph from the top:                  15 "Ultimately no reason that SSI cannot attain                  16 acceptable levels of access control and security.                  17 Recent strikes have tested the SSI before it really had                  18 a chance to bed in completely and it is expected that                  19 the strong relationships, understanding and cooperation                  20 at site will lead to deeper integration and an increased                  21 SSI performance in the future."                  22 That was the position as it was being relayed                  23 in December 2012?                  24 <b>A. Yes. This is the first time I have seen this document</b>                  25 <b>obviously, so you'll need to speak to John.</b>                  Page 139</p>
<p>1 Libyan and Mali situations need to be considered as                  2 evolving risks and then the penultimate sentence:                  3 "In both regions and to date no evidence suggests                  4 that regional events have directly impacted the project                  5 region or increased the risks to project activity.                  6 Subsequently the Gendarme protection and internal                  7 security procedures and strategy in place presently                  8 remain unchanged."                  9 Yes?                  10 <b>A. That's correct.</b>                  11 Q. If having undertaken all of these assessments and                  12 produced the weeklies and the monthlies and everything                  13 else that we have talked about it had been thought by                  14 the liaison team that the security situation had changed                  15 and the strategy in place needed to be changed it would                  16 have advised the JV accordingly, wouldn't it?                  17 <b>A. Yes, it would have done.</b>                  18 Q. This document then goes on to talk about the SSI                  19 implementation. I won't go through that now with you                  20 and then material in relation to the physical security                  21 measures, which we have already looked at.                  22 If you just turn over behind divider 5, the reason                  23 why I said it was six monthly is that was Quarter 2 and                  24 that was about June 2012. This one is Quarter 4 and it                  25 is again 2012 and it is again an internal security                  Page 138</p>	<p>1 Q. I will do. Just so we don't lose it because we have the                  2 document open, if you go under the heading "Physical                  3 site security" you see the author again said:                  4 "The level of physical security at IA sites is of an                  5 acceptable standard and the majority of outstanding                  6 items are being addressed."                  7 I don't want to misrepresent anything that is in                  8 these documents at all, Mr Fitzpatrick, and so there is                  9 no doubt about it, there were these tracking tables                  10 being circulated on a fairly regular basis --                  11 <b>A. Security management plan.</b>                  12 Q. -- which identified the things which were outstanding?                  13 Thank you.                  14 So this would be a sort of audit which was provided                  15 to the JV on a six monthly basis?                  16 <b>A. Mmm.</b>                  17 Q. Reviewing the security situation and the measures in                  18 place. Now, in addition to that of course ad hoc                  19 communications would be sent by the liaison team as and                  20 when it was necessary to do so?                  21 <b>A. Yes.</b>                  22 Q. And let's just look at one example because it is in this                  23 bundle, divider 8. This is again from the liaison                  24 manager at Hassi Messaoud, 12 January 2013. We really                  25 won't look at it in any detail, Mr Fitzpatrick, but it                  Page 140</p>

<p>1 deals with a situation in Mali with the French having 2 started to intervene militarily and in the second main 3 paragraph it says: 4 "Unlikely events in Mali will have direct security 5 implications on the projects. Both projects a long way 6 from the border. However, we can expect closer control 7 of movements." 8 And essentially liaison team will work closely with 9 the military on the ground to make sure that is managed 10 effectively. 11 So a specific incident which has occurred, a French 12 intervention in Mali. May have an impact on the risk 13 profile at In Amenas. That is assessed by the liaison 14 team and a communication is provided fairly 15 expeditiously to make sure everyone knows about it and 16 whether it changes the security profile? 17 <b>A. Mmm.</b> 18 Q. Is that right? 19 <b>A. That's right.</b> 20 Q. And there were other communications of that sort sent 21 again on a fairly regular basis as and when required? 22 <b>A. That's correct.</b> 23 Q. Through these various documents, and we have done a sort 24 of rapid tour through just some of them, but through 25 those you would obviously identify and record your Page 141</p>	<p>1 been producing? 2 <b>A. Yes, and it's looked at as intelligence gathering by the 3 Algerian government and it is seriously frowned upon.</b> 4 Q. But you were doing it and it was doing done -- 5 <b>A. And it was being done, yes.</b> 6 Q. -- and you sought to ensure that that sort of paper 7 wouldn't be lying around? 8 <b>A. Yes.</b> 9 Q. But the intention was, wasn't it, that whatever you 10 communicated to those team leaders effectively would be 11 cascaded down to everyone else? 12 <b>A. Yes, to the departments, yes.</b> 13 THE CORONER: I think he said, didn't he, that he was told 14 he could brief it to anybody who needed to know? 15 <b>A. Yes, that's correct.</b> 16 MR POPAT: In addition as between the liaison team personnel 17 you carried out handovers with your back-to-back, didn't 18 you. 19 <b>A. Not physical handovers, no, just handover notes.</b> 20 Q. We will look at just quickly, because it is attached to 21 your witness statement, the handover from Mr Morgan to 22 you which was the last handover obviously before the 23 incident. If you have your witness statement bundle. 24 It is just at the back of your witness statement? 25 <b>A. Which one, sorry?</b> Page 143</p>
<p>1 assessments and make any recommendations as appropriate, 2 but you also communicated your findings on a regular 3 basis to others within In Amenas, didn't you? 4 <b>A. Yes, we did, yes.</b> 5 Q. There were the town hall meetings that you described, 6 team leader meetings and what are called either IMT 7 meetings or FIMT? 8 <b>A. In Amenas is the FIMT.</b> 9 Q. And the FIMT meetings involve numerous, if you like, 10 department heads dealing with different things and would 11 always involve a security person? 12 <b>A. Yes.</b> 13 Q. Either you or Mr Morgan? 14 <b>A. Yes, that's correct and the ASI as well.</b> 15 Q. And the ASI. And at those meetings you would regularly 16 summarise what is effectively in the weekly summaries 17 that we have just looked at very quickly? 18 <b>A. Yes.</b> 19 Q. Just so that it is put to you, a witness who gave 20 evidence last week I think talked about attending one of 21 those meetings and you providing a briefing note which 22 he then said was required to be destroyed afterwards? 23 <b>A. Shredded, yes, that's correct.</b> 24 Q. And just so we understand it, that is a note which 25 summarised what was in the weekly summaries that you had Page 142</p>	<p>1 Q. I think it is that blue one just there. Mr Fitzpatrick, 2 I am afraid they are not paginated but if you have some 3 lettering in the top left-hand corner in red? 4 <b>A. Yes.</b> 5 Q. Do you have something which is "Anthony Fitzpatrick 6 handover notes"? It is after the photographs of the 7 overview? 8 <b>A. After the security management plan?</b> 9 Q. Yes. 10 <b>A. After the risk assessments, yes.</b> 11 Q. I wonder if it may be quicker if I may -- I think 12 everyone else knows where it is, Mr Fitzpatrick, if 13 I just hand you a clean copy? 14 <b>A. Yes, please.</b> 15 Q. To speed things along. (Handed) 16 <b>A. Thank you.</b> 17 Q. This is I think the latest assessment in time of any 18 liaison personnel as recorded in the documents we have. 19 These are Mr Morgan's notes to you dated 20 16 January 2013? 21 <b>A. Yes, it was initially sent out on 15 January.</b> 22 Q. I am literally going to pick out some points as quickly 23 as I can through this document, Mr Fitzpatrick, because 24 they record what he had identified to you at that time. 25 Third paragraph down on the first page: Page 144</p>

36 (Pages 141 to 144)

<p>1 "Drivers seem to be working more or less normally 2 now and I have not as yet received any complaints about 3 them at all." 4 Yes? 5 <b>A. Yes.</b> 6 Q. Over the page, the top, "threat level is low, working 7 under medium level", and we have understood from another 8 witness what that means so I won't ask you what that 9 means but that was being recorded to you? 10 <b>A. Yes.</b> 11 Q. The bottom of the page a report of an incident in La 12 Recule which was a security related incident which you 13 needed to be informed about? 14 <b>A. That's correct.</b> 15 Q. Page 4, please, internal page 4, having set out lots of 16 information under the heading "Conclusion" it talks 17 about the events, the industrial action by drivers and 18 then the third paragraph down: 19 "Captain fully up-to-date with all going events at 20 this moment and I'm regrouping all the drivers". 21 So captain kept informed and fully up-to-date and 22 you would expect that to happen? 23 <b>A. Yes.</b> 24 Q. Page 6, please, under the heading "Security management 25 plan and the internal security review" Mr Morgan records Page 145</p>	<p>1 Then he says: 2 "In my opinion this is a complete nonstarter." 3 In the next passage? 4 <b>A. Yes.</b> 5 Q. And that is the sort of thing you would do if you 6 considered there was any security risk or implication of 7 anything, that would be recorded and people would be 8 required to make the appropriate changes? 9 <b>A. Yes.</b> 10 Q. Just finally, page 23, a report on the Gendarmes 11 military. Bottom of that page: 12 "Captain has now found his feet and is extremely 13 amiable to work with. Outstanding infrastructure work 14 requested by the captain." 15 So this is the captain requiring certain things to 16 be done in the camp? 17 <b>A. At the rig site there, the first point is the rig site.</b> 18 Q. If you look at the third bullet point from the bottom: 19 "Straighten northern perimeter fence posts." 20 <b>A. Yes, I identified that actually.</b> 21 Q. So wherever that is that is identified and required to 22 be done? 23 <b>A. Basically at the military camp one of the drivers had 24 reversed into the fence line.</b> 25 Q. Using all of that information, the position as Page 147</p>
<p>1 that: 2 "Mr Wigg has sent the updated security management 3 plan and the new internal security review for 4 In Amenas." 5 Those are the documents we have just looked at, the 6 SMP and the security review and he says in the next 7 paragraph: 8 "I have not as yet forwarded the dossiers on to our 9 OLCs because although Lotfi and Mark have been sent 10 a copy I have not as yet had the opportunity to go over 11 it with them especially the internal security review." 12 Then he sets out what's there about the SSI internal 13 security review which includes the passage we have just 14 looked at, no reason why except for levels of access 15 control and so on, shouldn't be -- 16 <b>A. Yes, that is taken from John's original security review.</b> 17 Q. Page 10, an example of things that he's not happy with. 18 Bottom of that page under the heading "Irrigation BdV CC 19 tree planting." To summarise it there was a plan to 20 plant trees all the way round and in the second 21 paragraph from the bottom Mr Morgan says: 22 "Whatever they choose we will eventually have 23 security implications in the fact that the SSI's ability 24 to correctly the fence line with CCTV cameras will be 25 underlined." Page 146</p>	<p>1 at January 2013 was in summary that there was no 2 increased security risk and that the measures that were 3 in place with the military protection and physical 4 security were adequate to address and control the risks 5 that you had identified? 6 <b>A. That's correct.</b> 7 Q. Finally, because you have mentioned it a number of times 8 but I don't think anyone has actually taken you to it, 9 that was the sort of assessment which was contained in 10 risk assessments which were regularly produced by the 11 liaison team for the JV? 12 <b>A. Mmm.</b> 13 Q. You were taken to one document which I won't take you to 14 again because I think it's actually irrelevant, it 15 precedes the actual risk assessments which we have in 16 the core green bundle, just behind divider 15. 17 Mr Fitzpatrick you see the page numbering at the bottom 18 right, 181? 19 <b>A. Yes.</b> 20 Q. If you go on to 184, the first one is an Algerian 21 security risk assessment but 184 -- 22 <b>A. Yes.</b> 23 Q. -- is the JV liaison project risk assessment, this one 24 for 2012 and does it record the risks that you have 25 identified, in this case on the first page terrorism as Page 148</p>

<p>1 a particular risk with comments in the second column 2 along, second substantive column along? 3 <b>A. Yes, it does.</b> 4 Q. The probability and then all the actions which are 5 required to be in place to control that risk. Is that 6 right? 7 <b>A. Yes.</b> 8 Q. And that allows you to reach the risk assessment, the 9 figures that you have in the last two columns on the 10 right-hand side. Primary risk is 18, residual risk, 11 that is after the actions have been put in place, is 12 reduced to 14 which if we just turn over the page we see 13 puts that risk of terrorism in the medium category, yes? 14 <b>A. Yes, yes.</b> 15 Q. So all of these things, these signals, these indicators, 16 these issues have been considered by the liaison team 17 and have been assessed and you have made a professional 18 judgment having taken all of those things into account 19 of the appropriate control measures that need to be put 20 in place? 21 <b>A. Yes, I'm not sure I can comment on this last risk 22 assessment. I haven't seen it before so ...</b> 23 Q. I see. If it helps you there is one I think you 24 definitely have seen, if you turn over to tab 18? 25 <b>A. Yes, that's the type we would generate on site.</b></p> <p style="text-align: center;">Page 149</p>	<p>1 Q. Then SSI took over in mid 2012 a number of functions? 2 <b>A. Yes.</b> 3 Q. But in December 2012 the management of drivers came back 4 to liaison specifically, didn't it? 5 <b>A. Yes, that's what was noted in the handover notes. 6 I wasn't aware of that, yes.</b> 7 Q. And if you go to the core bundle 1 -- 8 <b>A. Is that the green?</b> 9 Q. -- tab 5. So that is green bundle, tab 5, the December 10 fourth quarter security overview, page 20, at the top it 11 says: 12 "In an effort to increase SSI performance and to 13 allow the ASIs to concentrate on their core roles the 14 drivers are now managed by the expat liaison team." 15 <b>A. That's correct.</b> 16 Q. You were there from Christmas to the first week 17 of January, weren't you? Isn't that right? Forgive me, 18 when did your last -- 19 <b>A. Four weeks prior to the attack.</b> 20 Q. Four weeks prior? 21 <b>A. Yes.</b> 22 Q. So that will have happened when you were away? 23 <b>A. Yes, that's correct.</b> 24 Q. Fine. So when you answered the question that my learned 25 friend put to you that the documents relating to</p> <p style="text-align: center;">Page 151</p>
<p>1 Q. I think the first page of that risk assessment is 2 actually at page 211 but it doesn't matter we don't need 3 to take time over it. 4 <b>A. Yes.</b> 5 Q. It is in a similar sort of format. Assessment of the 6 risks and the control measures that were required to be 7 put in place? 8 <b>A. Yes.</b> 9 Q. And that continued to be done by the liaison team 10 throughout the time that you were in place? 11 <b>A. That's correct.</b> 12 MR POPAT: Thank you. 13 Further questions from MR RITCHIE 14 MR RITCHIE: If there are no other questions I do have 15 I regret to say two or three questions for this witness 16 to tidy up what may be a misunderstanding, may I have 17 permission to do so, sir? 18 It is in relation to the management of the drivers 19 and particularly the drivers on that night. Are you 20 with me, Mr Fitzpatrick? 21 <b>A. Yes.</b> 22 Q. Before SSI took over many of the functions liaison on 23 site were in control of allocating drivers and vehicles 24 to the Gendarmes, weren't they? 25 <b>A. Yes, that's correct.</b></p> <p style="text-align: center;">Page 150</p>	<p>1 allocation of JV vehicles and drivers were not liaison 2 documents, they were ASI documents? 3 <b>A. Yes, that's correct.</b> 4 Q. Would you like to reconsider that answer in view of the 5 fact that the drivers were specifically being managed by 6 liaison from December 2012? 7 <b>A. Well, I wasn't there so I can't comment.</b> 8 Q. Let us just understand. The documents to manage drivers 9 going on patrol, you mentioned a 24 hour journey 10 document? 11 <b>A. Yes, a journey management plan, that's correct.</b> 12 Q. So you allocate the drivers on duty to vehicles? 13 <b>A. Yes.</b> 14 Q. And you allocate the driver and the vehicle to the 15 Gendarmes for the night patrols? 16 <b>A. That's correct.</b> 17 Q. And there are documents evidencing that? 18 <b>A. Yes.</b> 19 Q. And liaison from December were managing that? 20 <b>A. Mmm.</b> 21 Q. We obviously want to see who was driving that night? 22 <b>A. Yes.</b> 23 Q. And it appears that Mr Popat for BP is saying we can't 24 get our hands on the documents because ASI have them. 25 So could you make it clear so that Her Majesty's Coroner</p> <p style="text-align: center;">Page 152</p>

38 (Pages 149 to 152)

1 knows about these documents, when you are managing the  
 2 drivers and the allocation of vehicles are they  
 3 documents that you get to see and produce?  
 4 **A. They would have been, yes, definitely.**  
 5 MR RITCHIE: Thank you.  
 6 THE CORONER: Thank you very much indeed for all the time  
 7 you have given us. We are very grateful.  
 8 **A. Thank you, sir.**  
 9 **(The witness withdrew)**  
 10 MS DOLAN: Sir, the next witness is Mr Wigg.  
 11 MR JOHN WIGG (sworn)  
 12 Questions from MS DOLAN  
 13 (2.40 pm)  
 14 MS DOLAN: Mr Wigg, I think you know I'm Bridget Dolan, I  
 15 ask questions for the coroner. Will you give us your  
 16 full name please?  
 17 **A. Certainly. It's John Harry Wigg.**  
 18 Q. I think at the time of this incident you were in  
 19 Algeria?  
 20 **A. I was, yes.**  
 21 Q. Where were you?  
 22 **A. I was in Hassi Messaoud.**  
 23 Q. What was your role there?  
 24 **A. I was fulfilling the role of the ALM, the Algerian**  
 25 **liaison manager, I was actually in the last day of that**  
 Page 153

1 **post. I had actually resigned three months earlier and**  
 2 **that was my last morning in fact. I was due to fly out**  
 3 **that day and then return in four weeks in my new role**  
 4 **which was a health and safety one.**  
 5 Q. And how long had you held the role of liaison manager?  
 6 **A. Four years.**  
 7 Q. All that time in Hassi?  
 8 **A. Yes, yes, the liaison manager is always based in Hassi.**  
 9 Q. And we have had the structure of AFMC explained to us  
 10 but in summary you are the tier above Paul Morgan and  
 11 Mr Fitzpatrick?  
 12 **A. Yes, that's exactly what it is.**  
 13 Q. And to what extent does your role involve advising the  
 14 JV on security?  
 15 **A. So we would look at security risks rather than threat.**  
 16 **So that would be the nature.**  
 17 Q. Explain again the difference between risks and threat?  
 18 **A. Okay, so a threat would be something which could present**  
 19 **a menace, so if you assessed a threat you might say**  
 20 **there is a threat of a terrorist attack and somebody**  
 21 **would then look at that threat and make an assessment of**  
 22 **the likelihood, the probability of that threat**  
 23 **happening.**  
 24 **A security risk would be the tactics involved should**  
 25 **that attack happen or be brought to bear. So, for**  
 Page 154

1 **example, a terrorist attack may involve a VBIED so the**  
 2 **security risk is a VBIED. So we were dealing with how**  
 3 **would we counter a VBIED rather than make an assessment**  
 4 **of the likelihood of it happening or the likelihood of**  
 5 **that, the likelihood of the likelihood changing if you**  
 6 **like.**  
 7 Q. From what you are describing it might sound like you are  
 8 saying it wasn't the role of you or AFMC to be advising  
 9 on the likelihood of a threat arising but only how to  
 10 manage it in case it did?  
 11 **A. Yes. I suppose a good way of describing it might be**  
 12 **that we worked at a tactical level so we looked at the**  
 13 **tactical on site security provision to counter security**  
 14 **risks, but the overall direction and lead and overview**  
 15 **in what those threats might be came from above us.**  
 16 Q. And when you say above us, who was tasked with  
 17 considering how real or fanciful a threat was?  
 18 **A. So that would come from the shareholders and each**  
 19 **shareholder would tackle that differently.**  
 20 Q. And by the shareholders you mean?  
 21 **A. BP, Sonatrach, Statoil.**  
 22 Q. So what you seem to be describing is a responsibility  
 23 for deciding the reality of a threat lies with, in this  
 24 case the JV, and all you are doing is advising how to  
 25 then manage it but not on the reality of it?  
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1 **A. In a nutshell that's about it, yes.**  
 2 Q. We have seen one document, which I think we understand  
 3 was produced perhaps at a level below you. It is the  
 4 instructions for security officers in Tiguentourine.  
 5 I don't need to take you to it or if you want to look at  
 6 it --  
 7 **A. You don't need to. I think I know the document.**  
 8 Q. But in that document it identifies the threats as  
 9 a number of threats including forced entry by armed  
 10 terrorists at the base?  
 11 **A. Yes.**  
 12 Q. Do we take it then that that is a given?  
 13 **A. That's.**  
 14 Q. That is an existing threat?  
 15 **A. That is a security risk. So the risk is terrorists will**  
 16 **get in and it's the same if you look at the security**  
 17 **management plan and all the other documents in fact that**  
 18 **have been referenced here. They generally start with**  
 19 **a preamble or an overview of what's happening in the**  
 20 **region, what's happened recently in the country and then**  
 21 **it goes specifically to the security risks. So the**  
 22 **security management plan which has been spoken about**  
 23 **a lot is a good example.**  
 24 Q. If it is not for AFMC to be advising on the reality of  
 25 these risks what was the purpose of the information  
 Page 156

1 documents we have already heard about, the intelligence  
 2 documents, for example, the weekly assessments and the  
 3 monthly assessments which appear to be scrutiny of local  
 4 reports, newspaper reports, media reports and  
 5 intelligence, is that not the document which is advising  
 6 on behalf of AFMC about the reality of these risks?  
 7 **A. No, not at all. The way -- okay, the way it works, and**  
 8 **you can pretty much include most of the documents we**  
 9 **have spoken about here, they all go back, the**  
 10 **information in them all go back to a source set of data**  
 11 **and that typically was the weekly summary of risks which**  
 12 **came from BP. If you look at the WSR and then look at**  
 13 **the weekly notes that Fitz has described or some of the**  
 14 **others you can see that most of the points have just**  
 15 **been cut and pasted from that document into their**  
 16 **documents. And that was done to provide, to disseminate**  
 17 **the information, if you like. The guidance for the**  
 18 **weekly summary of risks was that it should be available**  
 19 **to staff, expat staff on the project but it shouldn't be**  
 20 **open source to everyone because it does control some**  
 21 **sensitive information.**  
 22 Q. So from what you are describing it is not that there are  
 23 three different documents being produced by three  
 24 different people which will all bring new information  
 25 there is actually the one main document, the BP

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1 document, and that is the source of all the information  
 2 which filters down to all the other ones?  
 3 **A. Yes, and that is natural for a couple of reasons. One**  
 4 **is that the shareholders' assessment of threat is always**  
 5 **going to take precedence over that of the JV. Because**  
 6 **BP, Statoil and Sonatrach don't send their staff to a JV**  
 7 **and franchise the security of those people for that JV.**  
 8 **They still have oversight and lead for their security.**  
 9 **So at our level we would speak to them and say, okay,**  
 10 **how do you see the threat and so and on so forth and**  
 11 **then we would talk about managing the security risks.**  
 12 Q. And then the documents which we have seen regarding  
 13 managing security risks, there is one at tab 11 in that  
 14 green bundle called the security management plan?  
 15 **A. Yes.**  
 16 Q. Can you help us with first of all the origin of that,  
 17 who creates that document?  
 18 **A. Okay, so that document is owned by my position. It is**  
 19 **a live document. It was a JOC approved document in**  
 20 **around 2006 I believe which is when the first edition**  
 21 **was written.**  
 22 Q. Just pausing there. You say owned by your position.  
 23 I suppose you have a back-to-back?  
 24 **A. Yes, Gary Butt.**  
 25 Q. And it is you and he who produces this document?

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1 **A. Yes, whoever is sitting in that chair updates it.**  
 2 Q. Sorry, I interrupted you. But you say then it is  
 3 approved by?  
 4 **A. Well, the origin of the document was that as a JV we**  
 5 **needed a document which laid out how we were going to**  
 6 **deliver security on the project and manage those**  
 7 **security risks. So there were a number of options**  
 8 **looked at and my predecessors proposed the format that**  
 9 **you have there. That went to both the In Amenas JOC and**  
 10 **the In Salah JOC because we work for both projects, we**  
 11 **shared resources. And both JOCs approved the format and**  
 12 **content of that document in the form that you see it**  
 13 **there and then from 2006 onwards my predecessors and**  
 14 **I have updated that in line with revisions of the**  
 15 **shareholder risk assessments and their security**  
 16 **management plans.**  
 17 Q. In respect of the purpose of this document what we see  
 18 at internal page 4 or page 93 of the bundle and it is  
 19 the first full paragraph below the second holepunch, the  
 20 one that starts with the JV, do you see that?  
 21 **A. Yes.**  
 22 Q. And what is expressed there is that:  
 23 "The JV is not able to prevent any terrorist or  
 24 criminal attack to the project as protection is the  
 25 responsibility of the Algerian security forces."

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1 Then it goes on to say:  
 2 "The project approach to security management is that  
 3 all security recommendations and procedures are aimed at  
 4 minimising the exposure to such risks."  
 5 Is what you are explaining that you are there to  
 6 talk about --  
 7 **A. Yes, that's the philosophy that underpins all our**  
 8 **recommendations and decisions.**  
 9 Q. "Limiting the probability of such attacks and protecting  
 10 personnel in the event that attacks should occur."  
 11 **A. Yes.**  
 12 Q. And then what is it in the rest of this document that  
 13 then focuses upon how to protect personnel and  
 14 installations in the event that the attacks do occur?  
 15 Because obviously it appears that that is what one does  
 16 should it be that the Algerian security forces aren't  
 17 able to stop the attack occurring?  
 18 **A. Okay, to give you some history here if you like, just to**  
 19 **make that. In 2006/2007 there were a set of extensive**  
 20 **recommendations put forward to both ISG and In Amenas at**  
 21 **the same time that this document was put together. And**  
 22 **virtually all the recommendations that you see tracked**  
 23 **in the appendices are a result of that. We hadn't**  
 24 **achieved implementation of all those measures which is**  
 25 **why they are still in that tracking document and then of**

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<p>1 course between 2006/2007 to date there has been 2 evolution of security risks, things have changed, so we 3 have made incremental recommendations along the way if 4 you like. 5 <b>And that tracking document, if you like, fulfils the 6 implementation and reporting and feedback part of 7 a standard SRM process.</b> 8 Q. What it says in this document is its intention is to 9 outline a suitable minimum standard? 10 <b>A. Yes.</b> 11 Q. Help us understand what that minimum standard is because 12 of course what we come on later is there are many things 13 recommended, some of which are implemented, some of 14 which take some time and are then implemented and some 15 of which were still outstanding at the time of these 16 events. What's the minimum standard that you are 17 working to? 18 <b>A. Okay, so let me start by first saying that all the 19 recommendations and the things that are being tracked in 20 the SMP are things that are JOC approved, so there's 21 nothing in this SMP that isn't JOC approved.</b> 22 Q. By that just to be clear, does that mean it has been 23 a recommendation made by your company? 24 <b>A. Yes.</b> 25 Q. And a recommendation which has been accepted in Page 161</p>	<p>1 make their decision whether that was appropriate or not 2 and In Amenas would make their decisions, ISG would make 3 their decisions. 4 Q. Again, help me with minimum standards in the oil and 5 hydrocarbon industry in Algeria. Are there minimum 6 standards in an industry wide guidelines or? 7 <b>A. Okay, I think I can see where you are going. So when 8 these recommendations were put forward there were 9 a number of resources used to find those recommendations 10 if you like. One was the BP protective security 11 document, which goes into various ways of protecting 12 a plant, obviously BP have plants all over the world. 13 One was that. One was the experience of some of the BP 14 management we had on site. One of them had been 15 responsible for building plants in the UK and he had 16 actually been on a number of UK government courses for 17 protecting Critical National Infrastructure, CNI 18 et cetera. So then we used the current BP threat 19 assessment and from that we looked at what BP have to 20 offer, what current guidelines are from the UK 21 government, CNI et cetera and then we looked at BP's 22 operational requirements. 23 So quite often when we talk about what we should do 24 or what we shouldn't do in terms of managing a security 25 risk or what a barrier should do for example, it is Page 163</b></p>
<p>1 principle? 2 <b>A. Absolutely.</b> 3 Q. And that is why it appears as approved in the document? 4 <b>A. It is more than that. If it's been JOC approved it has 5 been accepted for implementation. So everything in the 6 SMP has been through a JOC decision, been approved and 7 is waiting -- awaiting implementation.</b> 8 Q. In layperson's language this is a good idea, we should 9 be getting on with it, we think we should be doing it? 10 <b>A. Yes, exactly.</b> 11 Q. And we are now tracking whether it's happening or not? 12 <b>A. That's exactly what the function of that document is.</b> 13 Q. I asked about minimum standards? 14 <b>A. So --</b> 15 Q. Does that mean if it is in here it is a required thing, 16 it is a minimum standard to be met? 17 <b>A. Yes, so as I said a moment ago, 2006/2007, a set of base 18 requirements, if you like, were put forward to both 19 In Salah Gas and In Amenas independently for approval as 20 minimum standards and what you see in the SMP is what 21 was accepted and approved by the JOC. So as liaison, if 22 you like, we never had any executive decision making 23 power to say "this is what your minimum standard is". 24 We would give that to the JOC and say "we suggest this 25 should be your minimum standard", and then JOC would Page 162</b></p>	<p>1 easier to look at an operational requirement than it is 2 a specific item. So you wouldn't say "all walls have to 3 be brick walls". What you would say is a wall's 4 function is to stop people getting over it, under it or 5 through it but you might find that where you are, 6 because of where you are a wall is not suitable. So, 7 for example, if you are in the desert and there is a lot 8 of travelling sand and sand deposition because of 9 sandstorms et cetera, walls are unsuitable because you 10 end up with dunes at the side of them and you can walk 11 straight over them. Whereas a fence is better because 12 sand will blow straight through. 13 So what we did was we took those operational 14 requirements and then we looked through those and we 15 said, well what's the most suitable solutions to do this 16 and put those forward. 17 Q. Turning to page 10 and onwards of that document which is 18 where it has the landscaped table of physical security 19 measures? 20 <b>A. Sorry, is that tab 10?</b> 21 Q. Sorry, page 10 of that document. Sorry, it is the 22 document that is at tab 11 and then internal page 10 or 23 page 99 on the bottom right corner. It is when it turns 24 to landscape? 25 <b>A. Yes, the tracking part, yes.</b> Page 164</p>

41 (Pages 161 to 164)

1 Q. So you call this the tracking document?  
 2 **A. Yes, yes.**  
 3 Q. There is a number of physical security measures advised  
 4 on there. If you go to the second page?  
 5 **A. Okay.**  
 6 Q. In the middle we have entry exit points and then the  
 7 recommendation to install motorized vehicle sliding gate  
 8 on all main entrances?  
 9 **A. Mmm.**  
 10 Q. So we take it that is a recommendation which has been  
 11 put by AFMC and has been accepted by the JV?  
 12 **A. Yes, absolutely. In fact, that's part of an overall**  
 13 **entrance, included in that was the electronic man sized**  
 14 **turnstiles, so, you know.**  
 15 Q. And there had been consideration of chicanes and such  
 16 like as well on entry and exit points?  
 17 **A. Yes.**  
 18 Q. Can you help us with why it was a recommendation that  
 19 a sliding gate should be provided for physical security?  
 20 **A. Yes, certainly. One of the primary security risks that**  
 21 **we faced and still do face is that of forced entry,**  
 22 **forced entry and BBID. So it might be forced entry most**  
 23 **likely with a bomb on board or it might just be forced**  
 24 **entry by terrorists trying to get in.**  
 25 **So the recommendations around entries and exit**  
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1 **points are all around keeping people out. So the reason**  
 2 **a sliding gate was recommended over a sort of swing**  
 3 **gates if you like, is purely because it is harder to ram**  
 4 **through. And the expectation is when you give somebody**  
 5 **an operational requirement to build a security sliding**  
 6 **gate it's built such that you can't drive through it.**  
 7 Q. It appears that there was a sliding gate in place albeit  
 8 not a motorized one and it may appear that it was driven  
 9 through?  
 10 **A. Mmm, because the -- you can't -- it's very difficult or**  
 11 **what you shouldn't do when you are looking at mitigation**  
 12 **measures in security is a system. No one item or no one**  
 13 **part of that security system is normally destined to be**  
 14 **a standalone thing. So what should have happened is if**  
 15 **the gate was closed and the chicane was locked you can't**  
 16 **even get to the gate because the chicane is locked so if**  
 17 **the chicane fails to do its job then you have -- if the**  
 18 **locked part of the chicane fails to do its job then you**  
 19 **have to get through the chicane and then you haven't got**  
 20 **enough space between the last turn in that chicane to**  
 21 **build up enough speed to ram through that gate.**  
 22 THE CORONER: When you say the chicane is locked we heard  
 23 about a --  
 24 **A. Yes, so you have heard about this sort of chicane type**  
 25 **thing and then the end would be a -- what there was in**  
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1 **fact -- a swing barrier which swung into place and**  
 2 **locked. So if you were to present yourself to the**  
 3 **entrance of that chicane effectively what you are facing**  
 4 **is a blocked way.**  
 5 THE CORONER: This is assuming that somebody knows you are  
 6 up to no good?  
 7 **A. No.**  
 8 THE CORONER: You are saying that should have happened every  
 9 time?  
 10 **A. That should have been locked at all times.**  
 11 THE CORONER: I am not sure if you and I are necessarily  
 12 talking about the same thing. You just tell me what you  
 13 are talking about and then I'll know.  
 14 **A. Okay. So the procedure was, or the agreed procedure,**  
 15 **I'm sure it is going to come up again, but the agreed**  
 16 **procedure was that during the off peak periods, if you**  
 17 **like, that gate, the chicane, should have been locked.**  
 18 **So you cannot drive in or out.**  
 19 THE CORONER: I understand about the gate being locked.  
 20 When you say the chicane, what -- locking a chicane, it  
 21 doesn't -- just what are you talking about? What does  
 22 it look like, the bit that you lock?  
 23 **A. Can I draw it on a bit of paper?**  
 24 MS DOLAN: Would it be helpful to have the actual  
 25 photographs?  
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1 THE CORONER: Then you can just show us. I think I know but  
 2 I just want to make sure ...  
 3 **A. Of course.**  
 4 MS DOLAN: It should come up on the screen in front of you  
 5 or we can give you a paper copy.  
 6 **A. Yes, that's fine. But this is the inner one so it's the**  
 7 **one that's further out, but that will serve as an**  
 8 **example for me to explain if you like.**  
 9 THE CORONER: Yes.  
 10 **A. Okay, so this is one of three configurations of three**  
 11 **poles if you like, so there are two more further back.**  
 12 THE CORONER: Shall we just see if we can come further back?  
 13 There we are.  
 14 **A. There you go. So you see the bollard which is bent**  
 15 **over. There would have been a swing bollard, if you**  
 16 **like, a horizontal bollard.**  
 17 THE CORONER: To lock into that.  
 18 **A. That would have swung around and locked into that**  
 19 **bollard and thus creating a barrier which you can't**  
 20 **drive through.**  
 21 THE CORONER: That is just out of our picture on that?  
 22 **A. Yes.**  
 23 THE CORONER: Did you say there is another of those further  
 24 down?  
 25 **A. No, there's just one at the end.**  
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1 MS DOLAN: What we have been given to understand is that the  
2 time these events happened is a peak period.  
3 **A. That's correct.**  
4 MS DOLAN: And I think you mentioned that barrier being shut  
5 in off peak periods but of course in a peak period that  
6 barrier wouldn't have been closed because --  
7 **A. No.**  
8 Q. -- cars have to use that chicane to exit the car park?  
9 **A. That's correct.**  
10 Q. So you were describing the assumption that one doesn't  
11 rely on one piece of equipment?  
12 **A. Absolutely.**  
13 Q. There is the whole of the equipment but surely on that  
14 analysis on a peak time it is going to be impracticable  
15 to rely upon that chicane barrier?  
16 **A. That's correct.**  
17 THE CORONER: So then you are relying on one thing?  
18 **A. That's absolutely correct.**  
19 THE CORONER: And you say the principle is you shouldn't be  
20 relying on one thing.  
21 **A. That's correct.**  
22 THE CORONER: So what other things do you put in place -- so  
23 at peak time when the chicane won't be locked what else  
24 do you do so you are not relying solely on the gate?  
25 **A. There is very little you can do. And effectively that**  
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1 **should have only been opened when traffic was coming**  
2 **out. So if there was traffic coming out you couldn't**  
3 **have driven out because there would have been a car to**  
4 **block you inside that chicane.**  
5 THE CORONER: A vehicle in the way.  
6 **A. And once that vehicle had gone it should have been**  
7 **closed immediately afterwards. So peak period being you**  
8 **would expect to see a procession of vehicles leaving one**  
9 **after the other, so if you have got, I don't know, 20,**  
10 **30 vehicles coming out in a procession during peak time**  
11 **there is no opportunity to get in there because there is**  
12 **always one or two vehicles in that chicane. As soon as**  
13 **that peak period is finished it should have been closed.**  
14 THE CORONER: Thank you.  
15 MS DOLAN: The gates that had been recommended and approved  
16 to be installed, were they of similar security and value  
17 to the ones that are already there or were they  
18 different from that?  
19 **A. I never saw them. But I was led to believe that they**  
20 **were, you know, quite a bit more robust than the ones in**  
21 **place, but I never saw them myself.**  
22 Q. Had there been a specific recommendation about them  
23 being more robust or is it just that the ones that had  
24 been ordered to be motorized happened to be more robust?  
25 **A. No, that was part of the operational requirement is that**  
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1 **they had to be more robust. As Fitz explained earlier**  
2 **he saw what was being supplied and ordered another one.**  
3 Q. We have had the description of chicken wire gate for the  
4 ones that were present?  
5 **A. Yes, well it's chain link fence.**  
6 Q. But what was your understanding of why the ones that  
7 were newly ordered were more robust?  
8 **A. Because we'd asked for them.**  
9 Q. Again, was a more robust gate then the minimum standard  
10 that you talked about?  
11 **A. Yes, I mean, the whole entry design, if you like, was**  
12 **subject to change. For the CPF we had a complete**  
13 **different design that was going to be implemented which**  
14 **involved changing gates, external parking and closed**  
15 **gates. And for the BdV there were a number of upgrades**  
16 **that were due to be done. We had ordered and had**  
17 **received electronic turnstiles, so the pedestrian gate**  
18 **would have been one of those cruciform man height**  
19 **turnstiles that you see at the zoo or something which**  
20 **you can't get through which electronically lock out when**  
21 **you press a button or what have you. So we had those at**  
22 **the warehouse, they were due for installation and they**  
23 **came with proximity cards which -- you could have sat**  
24 **here on your computer and shut down all the entrances to**  
25 **the plant, from here remotely. So all that stuff had**  
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1 **been ordered, purchased, that was in the warehouse**  
2 **awaiting implementation.**  
3 Q. And looking back to page 11 in that landscape document,  
4 there are some dates in red in the far right column in  
5 respect of exit and entry points, can you help us with  
6 what they mean?  
7 **A. Yes, I mean, I introduced a colour code, if you like.**  
8 **The colour code was effectively the red ones were ones**  
9 **that we were still expecting to be implemented but**  
10 **hadn't. The ones that were green were the ones that had**  
11 **been implemented and were complete or near completion.**  
12 **And I believe I did some -- and I blacked out I think**  
13 **ones which were no longer going to happen or fell by the**  
14 **wayside.**  
15 Q. So we see here the dates July 2011, June 2012  
16 and December 2012 all in red with "no change" written  
17 next to them?  
18 **A. That's correct, yes.**  
19 Q. Can we discern from this when it was that the advice was  
20 given and accepted that motorized vehicle sliding gates  
21 should be installed on all main entrances?  
22 **A. Okay, that's a little harder because the whole entrance**  
23 **design/car park area into the BdV didn't actually follow**  
24 **the recommendations that we had put forward. So**  
25 **typically what had happened is we had made a set of**  
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1 recommendations, the JOC had chosen to do something  
 2 different so then when it went to a detailed study with  
 3 engineers there are a number of compromises that had to  
 4 be made. So for example, the electronic access control  
 5 system, ie the big turnstiles and proximity keys and  
 6 so on had been accepted by the JOC. We had bought it.  
 7 It was in the warehouse ready to be implemented but the  
 8 BdV entrance upgrade happened whilst that was in the  
 9 warehouse. So therefore there had to be a number of  
 10 amendments and changes made because we weren't building  
 11 it with electronic access control. Does that make  
 12 sense?  
 13 THE CORONER: When had the BdV entrance upgrade happened?  
 14 A. That happened around 2010 I think.  
 15 MS DOLAN: Can you help us with how long these gates had  
 16 been in the warehouse?  
 17 A. We bought them in, I think it was approved in -- JOC  
 18 approval was about 2008 and I think we bought them in  
 19 2009. So it would have been 2009 they would have been  
 20 on site.  
 21 Q. So the stronger gates had been in the warehouse for five  
 22 years?  
 23 A. Not the gates, the turnstiles.  
 24 Q. The turnstiles. The sliding gates, help us with those?  
 25 A. I can't. I don't know where they are or when they were

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1 delivered but they were all part of the same thing which  
 2 was recommended around 2008.  
 3 Q. So on that analysis about five years before events there  
 4 had been the recommendation for these things?  
 5 A. Yes.  
 6 Q. Is it possible now to find out when they arrived in the  
 7 warehouse?  
 8 A. I can't answer that but I'm sure the project can.  
 9 THE CORONER: Had the sliding gates arrived whenever it was?  
 10 Were they in there waiting?  
 11 A. I don't know. Sliding gates I don't know. Turnstiles,  
 12 electronic access controls, yes.  
 13 THE CORONER: It might have been that the sliding gates  
 14 hadn't even arrived.  
 15 A. Absolutely, absolutely.  
 16 MS DOLAN: And the gates on the CPF, what were they at that  
 17 time?  
 18 A. I believe the -- there are two gates at the CPF.  
 19 There's one to go in to the IBO, if you like. Are you  
 20 bringing up the thing are you?  
 21 Q. I am not sure we have a picture of the CPF, no.  
 22 A. Okay. So as you approach -- the IBO and the CPF share  
 23 a common exterior entrance if you look. So you go  
 24 through the first gate, which is a sliding gate from  
 25 memory, and that brings you into the area where the IBO

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1 is and the internal parking area and then if you carry  
 2 on and do a left you go into the actual plant area and  
 3 I believe that's a swing gate.  
 4 Q. And they were the swing gates?  
 5 A. I believe so, yes, from memory.  
 6 Q. And had there been recommendations about changing that?  
 7 A. Yes, the recommendation for the CPF and IBO was that  
 8 there should be no vehicle access at all to the IBO or  
 9 the CPF, all parking should be exterior. All gates  
 10 should be locked and only opened for service vehicles,  
 11 you know, whether that it be a catering vehicle or  
 12 a fire truck or what have you but traffic from people  
 13 working on the site should all be exterior, locked gate  
 14 policy. The chicane needed being built into a proper  
 15 one. There's a whole -- there was a whole entrance  
 16 upgrade study done by the engineers to incorporate these  
 17 systems.  
 18 THE CORONER: Had all that been accepted?  
 19 A. Yes.  
 20 THE CORONER: Do you know roughly when?  
 21 A. Well, the recommendation was from 2006/2007. The  
 22 studies were done over the next year or so because you  
 23 get the engineers involved to come up with solutions  
 24 that would work for the environment within which we  
 25 worked. And then they were, you know, incrementally

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1 implemented. The IBO and CPF I believe was -- the  
 2 construction work on those changes was due to happen in  
 3 2013 I believe.  
 4 THE CORONER: But all designed as it were, to deal with the  
 5 possibility of an ill motivated vehicle coming into one  
 6 of the -- that is what this is all about, a hostile  
 7 vehicle trying to get in.  
 8 A. Yes, that's -- the principal security risks that  
 9 underpinned all our advice were forced entry into one of  
 10 the sites, probably a VBIED. Kidnap or ransom --  
 11 Q. That is a vehicle borne IED?  
 12 A. Yes, a vehicle borne IED but in addition to that and the  
 13 reason we looked at these turnstiles, was an BBID, which  
 14 is a body board or explosive vest.  
 15 Q. Considering the document, if you turn to page 14 on  
 16 page 103 at the bottom, this is the CPF document and  
 17 there for entry and exit points what we see is in green.  
 18 It says "Measures in place". That doesn't appear to  
 19 suggest that there are things outstanding or outstanding  
 20 recommendations for gates at the CPF?  
 21 A. No, that says perimeter lights measures in place.  
 22 Entry/exit ports, where has it gone?  
 23 THE CORONER: Whereabouts?  
 24 MS DOLAN: I am on page 14.  
 25 A. I have got it in front of me. If we just go back.

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<p>1 MS DOLAN: At the BdV gates came under exit/entry points and                  2 there doesn't appear to be outstanding gates on the                  3 document there.                  4 <b>A. It doesn't, but the half chicane, I think on this one</b>                  5 <b>it's, what it's done is it has taken all the components</b>                  6 <b>of that entry/exit system and addressed them</b>                  7 <b>individually. So the chicane is one line item down.</b>                  8 <b>The barriers are one line item down. The security</b>                  9 <b>alarms again and then if you go up you have the</b>                  10 <b>perimeter vehicle barriers and fences.</b>                  11 Q. They are T bars. I couldn't see gates on there.                  12 <b>A. Okay, so let's have a look.</b>                  13 Q. The page before has CCTV and access?                  14 <b>A. The gates were part of it. They may have been</b>                  15 <b>overlooked if you like in the tracking document but they</b>                  16 <b>were certainly part of it.</b>                  17 Q. While we are on page 14 can I ask you about the security                  18 alarms?                  19 <b>A. Yes.</b>                  20 Q. Because again we see that there is a recommendation                  21 which is an accepted recommendation to install an                  22 integrated alarm which appears to start in 2008?                  23 <b>A. That's correct.</b>                  24 Q. Five years almost before events. And it still hasn't                  25 been installed and there is no sign it will be done in</p> <p style="text-align: center;">Page 177</p>	<p>1 <b>A. That's correct.</b>                  2 Q. And that had been the position for five years?                  3 <b>A. Yes.</b>                  4 THE CORONER: Even if -- that person was obviously at great                  5 risk on the face of it or potentially at great risk when                  6 they were doing that operation.                  7 <b>A. Mmm.</b>                  8 MS DOLAN: Can you then help us with the document you will                  9 find at tab 4 of that green bundle and it is the email                  10 that Mr Popat referred Mr Fitzpatrick to. It is                  11 a document which appears to have been written by your                  12 back-to-back Gary Butt.                  13 <b>A. Okay, yes, so this is from June, yes.</b>                  14 Q. And this was the email from 19 June to the managers in                  15 the JV?                  16 <b>A. Mmm.</b>                  17 Q. And the question arose about the bottom of page 3 where                  18 it says "Summary".                  19 <b>A. Yes.</b>                  20 Q. And maybe because you didn't write this document you may                  21 not be able to shed any light on it but are you able to                  22 explain what is meant by the phrase we see there like:                  23 "The physical security measures in place at the                  24 In Amenas temporary and permanent camps are adequate but                  25 outstanding and remain to be addressed and upgraded to</p> <p style="text-align: center;">Page 179</p>
<p>1 the immediate future by December 2012?                  2 <b>A. That's correct.</b>                  3 Q. What we understand from other evidence is that there was                  4 a fire alarm but to make it into an intermittent                  5 security alarm it needed a manual operator to be                  6 flicking the switch backward and forwards?                  7 <b>A. That is my understanding, yes.</b>                  8 Q. Did that meet the minimum standards?                  9 <b>A. It was -- the agreement by the JOC was that there should</b>                  10 <b>be a dedicated standalone security alarm and at the time</b>                  11 <b>of the attack that hadn't been implemented so no it</b>                  12 <b>hadn't met the JOC agreement on what should be in place.</b>                  13 Q. Because clearly it is important that people don't muster                  14 if it is a terrorist event?                  15 <b>A. Absolutely.</b>                  16 Q. And if one requires a human being to be there flicking                  17 a switch up and down that's not going to happen --                  18 <b>A. No.</b>                  19 Q. -- if terrorists have intervened with that person?                  20 <b>A. That's correct.</b>                  21 Q. So at the time there was no mechanism by which anybody                  22 at the CPF IBO could be warned: this is a terrorist                  23 event?                  24 <b>A. That's correct.</b>                  25 Q. If a person flicking the switch was removed?</p> <p style="text-align: center;">Page 178</p>	<p>1 meet the minimum standards."                  2 On the face of it something being inadequate and                  3 doesn't meet the minimum standards appears --                  4 <b>A. That phrase or a very similar phrase appears in the one</b>                  5 <b>from December as well which was the one that I wrote.</b>                  6 <b>So we both pretty much said the same thing which is that</b>                  7 <b>we considered the physical site security as adequate but</b>                  8 <b>not good because it relied too heavily on the SSI to</b>                  9 <b>perform their tasks with exact precision, so we've</b>                  10 <b>already spoken about closing and opening chicanes. Of</b>                  11 <b>course vehicles would need to be searched in and out.</b>                  12 <b>So if you have got dozens of vehicles going in and out</b>                  13 <b>of your camp or plant. You're reliant on the guards to</b>                  14 <b>make sure they do 100 per cent perfect searches every</b>                  15 <b>time: which to us was not the preferable way if you</b>                  16 <b>like.</b>                  17 <b>So we considered the security there adequate because</b>                  18 <b>there was a mechanism for making sure the place was</b>                  19 <b>safe. It is just it relied heavily on the guards doing</b>                  20 <b>their job and another philosophy, if you like, that</b>                  21 <b>underpinned our recommendations was minimising your</b>                  22 <b>reliance on manpower and increasing your reliance on</b>                  23 <b>physical structures. So if vehicles were parked outside</b>                  24 <b>there wouldn't be a requirement to search them and you</b>                  25 <b>could lock the gates so you wouldn't be worrying about</b></p> <p style="text-align: center;">Page 180</p>

1 **opening and closing a chicane. So they were adequate**  
 2 **and they worked or should have worked but they were**  
 3 **reliant on manpower. So that's --**  
 4 Q. Is that what we find on the last page of that document  
 5 because then in the final paragraph of the last page it  
 6 says:  
 7 "The current set of procedures and protocols in  
 8 conjunction with the protection and deterrent provided  
 9 by the site Gendarme attachment are proportional to the  
 10 current security situation and adequately mitigate the  
 11 identified risks."  
 12 **A. Yes, so in layman's terms what Garry is saying there,**  
 13 **and I support that, is that the situation on that day is**  
 14 **passable but it's not what we would prefer to have.**  
 15 Q. And is that if it operates in conjunction with  
 16 protection and deterrent by the Gendarmes?  
 17 **A. Absolutely. I mean, it has been -- I have spent a few**  
 18 **days listening in the audience here, so there has been**  
 19 **a lot of talk about military and offsetting that. If**  
 20 **you look at the recommendations from the security**  
 21 **management plan and other recommendations that have been**  
 22 **put forward in the years and months previous to the**  
 23 **attack you can see that where we were going with our**  
 24 **recommendations was minimising that reliance on the**  
 25 **military and that was something which was supported by**  
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1 **the project at various stages of implementation.**  
 2 Q. So then the question of adequacy perhaps can be  
 3 considered in two contexts. There is the context of if  
 4 the military and the Gendarmes are providing a deterrent  
 5 and protection, and it appears that that last paragraph  
 6 suggests if they are doing that this is adequate?  
 7 **A. No, no. The two are separate. When we refer to**  
 8 **adequacy here we are talking about adequacy of the**  
 9 **internal security being able to deliver the operational**  
 10 **requirement that we have put to it. The operational**  
 11 **requirement being to stop forced entry.**  
 12 Q. Just to be clear, the message therefore that is coming  
 13 from you to BP or to the JV --  
 14 **A. JV, yes.**  
 15 Q. -- about whether this is adequate or not is in the  
 16 context of if people get beyond the Gendarmes?  
 17 **A. Absolutely.**  
 18 Q. And you were saying if they get beyond the Gendarmes  
 19 what was your message to the JV?  
 20 **A. Was that the system they have in place is adequate but**  
 21 **there's a lot of recommendations that have been accepted**  
 22 **by the JOC that need to be implemented to bring that**  
 23 **level of security and assurance, if you like, up.**  
 24 Q. Can I just move on then briefly to the actual events on  
 25 the 16th?  
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1 **A. Yes.**  
 2 Q. Because I think you, as you say, it was your last day in  
 3 that particular role and I think you received a call  
 4 early in the morning?  
 5 **A. That's correct.**  
 6 Q. Can you tell us about that?  
 7 **A. Okay, so about the 5.50 I got a call from Yann Desyeux.**  
 8 **He was using the OLS's mobile phone which is common**  
 9 **practice because Paul was crew changing out so he held**  
 10 **the phone while he's out. He called me. I was in my**  
 11 **room just getting out of bed actually about to pack my**  
 12 **bag and go and he said, "Yeah, okay, John, we're under**  
 13 **attack. There's about half a dozen terrorists got into**  
 14 **the camp. They're dressed in military uniforms and**  
 15 **they're shooting people. Get us some help."**  
 16 Q. Did he give you any indication of how the terrorists had  
 17 come into the camp?  
 18 **A. None whatsoever.**  
 19 Q. And then what happened next?  
 20 **A. I threw on some clothes. I immediately called the IMT**  
 21 **manager who was Carl Dawbarn at the time, told him, this**  
 22 **is -- and then left the room. So this is happening**  
 23 **concurrently if you like. So I'm running up towards my**  
 24 **office where I know my assistant is and while I am**  
 25 **running up I called Carl and asked Carl to raise the IMT**  
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1 **and I called Jeff Yates who is the president of In Salah**  
 2 **Gas and told him to get to the IMT as well. Got to the**  
 3 **office, grabbed hold of my assistant who is a national,**  
 4 **Messaoud, and said to Messaoud: right, we need to call**  
 5 **these numbers to raise the alarm. And the reason**  
 6 **I called Messaoud was because I speak fluent French but**  
 7 **at 5.50 am you are not necessarily going to get through**  
 8 **to someone who speaks French you are going to get**  
 9 **through to the guy who's manning the phone.**  
 10 **So we called the Gendarmerie in Hassi Messaoud. The**  
 11 **reason we called Hassi is because that's the parent unit**  
 12 **of the detachment that are actually on site in**  
 13 **In Amenas. We called the 13 GGF which Fitz has already**  
 14 **detailed, who were the frontier guards that were based**  
 15 **in In Amenas because we had their number.**  
 16 Q. That is In Amenas town?  
 17 **A. In the town, yes and we also called Colonel Fata who is**  
 18 **in Teg. Colonel Fata has nothing to do with In Amenas.**  
 19 **He works in the In Salah Gas project but we called him**  
 20 **because I know him from having several meetings with him**  
 21 **and he's the highest ranking guy that I knew I could get**  
 22 **on the phone and would understand that this is real and**  
 23 **it is not -- we need some help.**  
 24 Q. Did you get hold of him?  
 25 **A. Yes, I had his personal mobile number which I gave to**  
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<p>1 <b>Messaoud. I said ring this guy. Tell him you are</b>  2 <b>calling on behalf of me, I am here to speak to him if</b>  3 <b>necessary and just tell him that In Amenas is being</b>  4 <b>attacked and to call whoever he can call, because he had</b>  5 <b>taken it and called the Gendarmerie in Hassi Messaoud is</b>  6 <b>going to take time to go up and the same with In Amenas.</b>  7 <b>Whereas Colonel Fata could have called whoever and gone</b>  8 <b>straight in.</b></p> <p>9 Q. I think you continued to get some messages from Yann as  10 you went on?</p> <p>11 <b>A. Yes, I got, I couldn't tell you how many but</b>  12 <b>periodically Yann would -- he called rather than texted</b>  13 <b>and he would give us brief updates of what was</b>  14 <b>happening.</b></p> <p>15 Q. Can you tell us what he was saying to you?</p> <p>16 <b>A. Yes, he said a number of things over several calls, so</b>  17 <b>the order may not be correct, but in general he said</b>  18 <b>that they were shooting people, that they dressed as</b>  19 <b>military. That some of the locals on the base were</b>  20 <b>helping them but he didn't go into any detail about what</b>  21 <b>that was or whether that was under duress. And then he</b>  22 <b>said, yes, they're rounding people up in the living area</b>  23 <b>which you have already pointed out, which is that</b>  24 <b>circular area in the middle of the BdV.</b></p> <p>25 Q. Where was Yann when he was making these calls to you?</p> <p style="text-align: center;">Page 185</p>	<p>1 <b>He said, "Yes, John, I'm hostage now. And then he</b>  2 <b>carried on calling me from his mobile phone inside his</b>  3 <b>pocket so I could hear what was going on while he was</b>  4 <b>pressing the green button, if you like in his pocket.</b>  5 <b>And then eventually that was -- that died, that stopped.</b></p> <p>6 Q. What did you hear while he was pocket dialing you?</p> <p>7 <b>A. Just a lot of scuffling, a lot of pushing, a lot of</b>  8 <b>shouting. That was it really. I couldn't discern any</b>  9 <b>more than that.</b></p> <p>10 Q. And then I think there was another call from Yann later  11 on?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Tell us about that?</p> <p>14 <b>A. Later on he called from a different means, from</b>  15 <b>a satellite phone and at this point he said that he had</b>  16 <b>been told to call me by a terrorist, who was standing</b>  17 <b>next to him. That he was with around a dozen others</b>  18 <b>that had grenades strapped round their necks in a circle</b>  19 <b>on a single detonation mechanism. And that if we didn't</b>  20 <b>call the helicopter gunships off within the next 20 to</b>  21 <b>30 minutes they were all going to get executed.</b></p> <p>22 Q. Do you know what time this call was?</p> <p>23 <b>A. It was the morning of the 17th around, it was morning so</b>  24 <b>I'm guessing, well not guessing, but from what I can</b>  25 <b>recall somewhere between 8 and 10 o'clock, somewhere</b></p> <p style="text-align: center;">Page 187</p>
<p>1 <b>A. So he was in his office which is the --</b>  2 Q. If you would like to have the picture up?</p> <p>3 <b>A. If you bring it up I will describe it for you.</b></p> <p>4 Q. It is the big sheet, C36, and you will get it on the  5 screen as well.</p> <p>6 <b>A. Okay, if you look at the yellow arrow which says, which</b>  7 <b>is indexed "inner gate". If you come just south of</b>  8 <b>there or just southeast of there you can see a blue,</b>  9 <b>square blue roofed building with a little bit protruding</b>  10 <b>on the bottom left-hand edge. That's actually indexed</b>  11 <b>OLC/CCTV building.</b></p> <p>12 Q. Yes.</p> <p>13 <b>A. And his office would be on the south side of that and</b>  14 <b>his field of view from his office would be across to the</b>  15 <b>communal area, if you like, where that circular feature</b>  16 <b>is.</b></p> <p>17 Q. Which we have been calling the plaza?</p> <p>18 <b>A. Yes, exactly.</b></p> <p>19 Q. I think there came a time when Yann told you he had been  20 captured?</p> <p>21 <b>A. That's right. A couple of hours later he called. It</b>  22 <b>wasn't clear whether he had been captured or he was</b>  23 <b>about to be captured but he just said "John, I'm hostage</b>  24 <b>now ". I believe he was speaking in English rather than</b>  25 <b>French. We used to swap between the two all the time.</b></p> <p style="text-align: center;">Page 186</p>	<p>1 <b>round there.</b></p> <p>2 Q. In your witness statement you did back in July 2013 you  3 thought it was 8.45?</p> <p>4 <b>A. All those timings -- I gave my mobile phone to the</b>  5 <b>police, they downloaded everything so you can get second</b>  6 <b>accuracy on those phone calls.</b></p> <p>7 Q. So that was the following day that that call came in?</p> <p>8 <b>A. Yes, yes.</b></p> <p>9 Q. On the first day of events I think you also got calls  10 from some other people?</p> <p>11 <b>A. Yes, well, the IMT in general started buzzing with</b>  12 <b>people calling friends to say, "people are on the base</b>  13 <b>saying, what's going on?" And so on and so forth. Me,</b>  14 <b>personally I received calls from Yann and from Al McLeod</b>  15 <b>who was one of the workers on site.</b></p> <p>16 Q. Was there any system in place at the time so people in  17 this situation knew who to call or had a central point  18 or a way of passing messages?</p> <p>19 <b>A. We established early on in the IMT when it was clear</b>  20 <b>that a lot of people were calling friends and</b>  21 <b>back-to-backs, we formed a little dedicated cell and</b>  22 <b>collected up as many mobile phone numbers as we could</b>  23 <b>from friends of people, of a list of numbers, if you</b>  24 <b>like, of people that were on site and then people who</b>  25 <b>were receiving calls we put the message out to give us</b></p> <p style="text-align: center;">Page 188</p>

47 (Pages 185 to 188)

1 those numbers and then what we did was we sent out  
 2 incremental advice as and when we had it.  
 3 So for example, one of the text messages going out  
 4 to the guys on site was: stay well hidden. Be aware  
 5 terrorists are searching the camp room to room. They're  
 6 dressed as military and they may have project people  
 7 with them. So don't trust anyone. If you hear  
 8 a familiar voice outside that door telling you to come  
 9 out ignore it. It's not -- you know, it's not the all  
 10 clear.  
 11 Q. But there wasn't any pre-arranged system for that. It  
 12 depended on pot luck of who rang, who had numbers and  
 13 who got in contact?  
 14 A. That's correct.  
 15 Q. I think you were with Bill Johnston when he took a call?  
 16 A. That's correct. I can't remember the exact time. It  
 17 was around the same time as Yann.  
 18 Q. This was on the 17th?  
 19 A. Yes, so around the same time as Yann. Bill received  
 20 a call from a terrorist. We, I recognised fairly soon  
 21 that it was from a terrorist, you could see Bill was --  
 22 you could see by his facial expression he wasn't getting  
 23 a call from his wife. So we went into a break away room  
 24 which we had behind the IMT with Jeff Yates, the three  
 25 of us were there. Bill put the chap on loudspeaker and

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1 what we heard was a terrorist ranting about calling  
 2 helicopter gunships off, about how he was going to kill  
 3 everyone, like they did in 97. No idea what the  
 4 relevance or what the reference to 97 was. He wanted to  
 5 speak to the boss and kept insisting that Bill was the  
 6 boss and we were saying to Bill like, you're not the  
 7 boss. Just tell him you'll take a message and we'll  
 8 pass it on sort of thing.  
 9 And there was a commitment from the terrorist that  
 10 he was going to ring back in half an hour which he  
 11 didn't. That was about it really and that was -- the  
 12 information from that was passed straight back to the  
 13 business support team in London who passed it on to the  
 14 police.  
 15 Q. Was there anything distinctive about that terrorist's  
 16 voice?  
 17 A. Yes, he had distinctive north American accent. It  
 18 didn't, to me it didn't sound native but that's my  
 19 personal opinion. It sounded like it was almost his  
 20 second language if you like. It was heavily accented  
 21 but there was definitely a north American twang to it.  
 22 Q. I think you mentioned earlier that Yann had said that  
 23 locals were helping the terrorists but you weren't sure  
 24 of the circumstances. Did you hear that from anyone  
 25 else?

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1 A. Al McLeod said there were some of the nationals helping  
 2 the terrorists get food and I think that was ongoing  
 3 over a couple of days because Al was hiding for about  
 4 three or four days. But again, it wasn't -- there was  
 5 no indication whether they were under duress or not.  
 6 Nick Hitch, post incident chatting to him suggested that  
 7 some of the nationals almost ran towards the terrorists  
 8 as they come through the gates and that some of them  
 9 didn't look like they were necessarily under duress when  
 10 they were doing as they were instructed by the  
 11 terrorists.  
 12 MS DOLAN: Thank you, I have no more questions for you.  
 13 Questions from MR SHARGHY  
 14 (3.33 pm)  
 15 MR SHARGHY: Mr Wigg, I ask questions on behalf of the  
 16 family of Carlos Estrada. Can I start off by  
 17 summarising if I can, and hopefully fairly, the evidence  
 18 you gave to Ms Dolan regarding the process and the role  
 19 that you played as liaison manager?  
 20 A. Yes.  
 21 Q. I think what you said was that your role was to assess  
 22 the risk, not necessarily the threat, but assess the  
 23 risk, to provide a document, security management plan,  
 24 which was itself setting out minimum standards but was  
 25 flexible enough to deal with emerging threats and any

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1 other matters which needed to be considered; is that  
 2 fair?  
 3 A. The SMP was effectively an implementation plan of JOC  
 4 approved measures that were in place.  
 5 Q. What you and your colleagues would do is feed into that  
 6 process security recommendations in regards to how to  
 7 make the site safer?  
 8 A. Not quite. There's a little bit of the process missing  
 9 there. We couldn't -- we wouldn't, for example, do  
 10 a six month review and suddenly make some  
 11 recommendations in there that hadn't first been  
 12 presented to the JOC for approval. So I wouldn't, for  
 13 example, suddenly put something in there that said we  
 14 needed I don't know 15 more gates or something.  
 15 Q. That wasn't my question. My question was or my summary  
 16 was that your recommendations to the JV, whether it is  
 17 the JOC or the business support manager, would be along  
 18 the lines of: items, processes, systems that would make  
 19 the site safer?  
 20 A. No, that's not -- it's a tracking document which gives  
 21 an overview of the current security risks and it details  
 22 the agreements that have been made and an update on  
 23 where we are with those.  
 24 Q. Once those recommendations are supported, approved, if  
 25 they are going to be implemented when they would be

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<p>1 implemented, how they will be implemented is not down to 2 the liaison team, is it? 3 <b>A. No, not at all.</b> 4 Q. It is down to the JV? 5 <b>A. Yes.</b> 6 Q. And within the JV there are three entities, BP, Statoil 7 and Sonatrach. If I caught your answer at the beginning 8 clearly what you were indicating is that each may 9 actually have different views as to those 10 recommendations? 11 <b>A. No. They may have differing ideas about the threat 12 perhaps but the security risks are normally common to 13 all those threat assessments.</b> 14 Q. So once the recommendations are approved they are 15 approved by the JV collectively? 16 <b>A. Yes, by the JOC.</b> 17 Q. All three entities? 18 <b>A. Yes.</b> 19 Q. And you indicated the definition, your definition of 20 what adequacy meant but I also recall your saying that 21 the protection at this site prior to any of the 22 outstanding works to be undertaken was passable? 23 <b>A. Yes.</b> 24 Q. That was your word, it was passable. The risk 25 assessment for 2012 which the JV liaison project</p> <p style="text-align: center;">Page 193</p>	<p>1 <b>A. Yes.</b> 2 Q. Can I ask you to have a look at the actions in place? 3 This is what brings a high risk down to a medium. Can 4 you go down approximately nine points, "practice good 5 security protocol", do you have that? 6 <b>A. Mmm.</b> 7 Q. By that it means, doesn't it, to make sure that the 8 gates are shut when they are supposed to be shut, to 9 make sure that vehicle checks are carried out, personnel 10 checks are carried out, that sort of thing? 11 <b>A. Yes.</b> 12 Q. But your information and evidence is that that wasn't 13 happening? 14 <b>A. No, my evidence is that it was inconsistent.</b> 15 Q. But it wasn't happening effectively, was it, and it 16 wasn't happening in accordance with the protocol that 17 you had put into place? 18 <b>A. Which protocol are we talking about here?</b> 19 Q. Well, you teach and you have produced a document, I can 20 take you to it if you want, instructions to guards, 21 risk, terrorism, make sure you carry out vehicle checks, 22 make sure your carry out personnel checks, identity 23 checks, that sort of thing. That is what I term 24 a protocol. That is a document. 25 <b>A. Okay.</b></p> <p style="text-align: center;">Page 195</p>
<p>1 produced and Mr Popat took Mr Fitzpatrick through this 2 and if I can ask you to go to the green bundle, please, 3 behind tab 15, and it is page 184? 4 <b>A. Yes.</b> 5 Q. Can I just ask you, is this a document you have seen 6 previously? 7 <b>A. Yes, yes, I --</b> 8 Q. Did you have any hand in production or contributed to 9 this document? 10 <b>A. Yes.</b> 11 Q. We can see there that 1A, the primary risk is a risk of 12 terrorism. That is not in issue. We then have the 13 primary risk which is set at 18. This is the 14 penultimate right-hand column and 18 places that risk 15 within the high category? 16 <b>A. Yes.</b> 17 Q. And then in the final column we have the residual risk, 18 14? 19 <b>A. Yes.</b> 20 Q. Now, the residual risk is dependent on the actions in 21 place being placed -- the actions in place are 22 effective? 23 <b>A. Yes.</b> 24 Q. And are adhered to and are being regularly reviewed to 25 make sure they are being carried out?</p> <p style="text-align: center;">Page 194</p>	<p>1 Q. You know from your own experience of being at the IA 2 plant and from information which had been fed up to you 3 from Paul Morgan and Anthony Fitzpatrick that that was 4 not being carried out in accordance with that document 5 with the training and with what you expected. Is that 6 right? 7 <b>A. It is but that only says part of the story because we 8 were aware of that and we had made recommendations to 9 counter that.</b> 10 Q. But it still was not being effectively carried out? 11 <b>A. Agreed.</b> 12 Q. Regardless of your recommendations, regardless of the 13 military undertaking discussions with you as liaison and 14 with the JOC, it still wasn't being put into place 15 effectively, was it? 16 <b>A. The gates weren't closed, no.</b> 17 Q. And therefore, one of the actions in place which was 18 practice good security protocols was not actually 19 a mitigating factor, was it? 20 <b>A. Well, you need to understand that at the time of the 21 attack and for the six months before the attack those 22 actions were deliverable by Sonatrach and the ASI. So 23 we were very much in a monitoring function and we had 24 reported back that the ASI and Sonatrach were not 25 adhering to the protocol of keeping the gate closed,</b></p> <p style="text-align: center;">Page 196</p>

<p>1    <b>yes.</b></p> <p>2    Q. But this JV liaison risk assessment is your document?</p> <p>3    <b>A. Ah, well this JV liaison risk assessment comes from the</b></p> <p>4    <b>BP regional risk assessment and if you compare the two</b></p> <p>5    <b>documents you'll find that one follows the other. So</b></p> <p>6    <b>the risk ratings here are actually from BP.</b></p> <p>7    Q. So did you simply copy the BP document?</p> <p>8    <b>A. Yes.</b></p> <p>9    Q. You didn't apply your own mind --</p> <p>10   <b>A. Let me clarify. What we did was to take the BP document</b></p> <p>11   <b>and turned it into a JV because there are a few minor</b></p> <p>12   <b>adjustments that need to be made.</b></p> <p>13   Q. But on the whole you took a BP document and BP would say</p> <p>14   in fact and in fact Mr Cobb says that all of the</p> <p>15   security information and direction was taken from you,</p> <p>16   liaison?</p> <p>17   <b>A. No, no, I was an indirect report to a north Africa</b></p> <p>18   <b>security director who gave us --</b></p> <p>19   Q. Who was that?</p> <p>20   <b>A. Barry Shaw. Who gave us oversight and lead on Surete,</b></p> <p>21   <b>vulnerability assessments and would hand down the</b></p> <p>22   <b>security risks. What that risk assessment is a summary</b></p> <p>23   <b>of security risks.</b></p> <p>24   Q. Can I just show you a document, please, the organogram,</p> <p>25   sir, which Mr Ritchie kindly produced last week. Do you</p> <p style="text-align: center;">Page 197</p>	<p>1    <b>that would have been the Sonatrach president at the</b></p> <p>2    <b>time.</b></p> <p>3    Q. The swing arm gate that we see at the front of the outer</p> <p>4    gate of BdV your information was usually open, correct?</p> <p>5    <b>A. Agreed.</b></p> <p>6    Q. The main external gates, the outer external gate was</p> <p>7    also usually left open?</p> <p>8    <b>A. Yes, can I put a clarification in there? I believe --</b></p> <p>9    <b>are you quoting from my statement?</b></p> <p>10   Q. Yes.</p> <p>11   <b>A. Okay. So yes, the gate was usually open. However,</b></p> <p>12   <b>in July of 2012 in response to a note from Sonatrach to</b></p> <p>13   <b>the military that there was an increased risk of VBIED,</b></p> <p>14   <b>which Mr Ritchie referenced the other day in fact, we</b></p> <p>15   <b>sent a note out to the projects, both ISG and In Amenas,</b></p> <p>16   <b>highlighting that risk of forced entry and that external</b></p> <p>17   <b>parking and a closed gate policy would be the most</b></p> <p>18   <b>effective way of countering that security risk.</b></p> <p>19    <b>So in In Amenas an agreement was reached,</b></p> <p>20   <b>Paul Morgan in fact had a meeting with the JOC members</b></p> <p>21   <b>in In Amenas and agreement was reached that the gate</b></p> <p>22   <b>from July onwards, the gate would be officially closed</b></p> <p>23   <b>during those off peak periods. The reason I think</b></p> <p>24   <b>that's relevant is because there is a timeline here and</b></p> <p>25   <b>I heard the other day some of the witnesses saying that</b></p> <p style="text-align: center;">Page 199</p>
<p>1    have that in front of you?</p> <p>2    <b>A. Yes, I do.</b></p> <p>3    Q. For these purposes I am only looking on the right-hand</p> <p>4    side of that page?</p> <p>5    <b>A. Okay.</b></p> <p>6    Q. You can see where liaison management is and there's</p> <p>7    Gary Butt and yourself, do you see that?</p> <p>8    <b>A. Yes.</b></p> <p>9    Q. And below you are the OLSs and OLCs?</p> <p>10   <b>A. Yes.</b></p> <p>11   Q. And the arrow going up from you and this is in</p> <p>12   accordance with your witness statement that you gave to</p> <p>13   the Metropolitan Police, your report would go to the</p> <p>14   business support management team in Hassi Messaoud where</p> <p>15   you were based yourself and they would then feed into</p> <p>16   the JOC?</p> <p>17   <b>A. Correct.</b></p> <p>18   Q. Are you suggesting that there should be another arrow</p> <p>19   leading from you, ALM, to Mr Barry Shaw or anyone else</p> <p>20   at BP directly?</p> <p>21   <b>A. Okay, so to clarify, I am a direct, or I was, a direct</b></p> <p>22   <b>report to the business support manager and I was an</b></p> <p>23   <b>indirect report to Barry Shaw, but I was also an</b></p> <p>24   <b>indirect report to Statoil should they have taken that</b></p> <p>25   <b>opportunity and also to Sonatrach and with Sonatrach</b></p> <p style="text-align: center;">Page 198</p>	<p>1    <b>after the SSI had taken over actually the gate appeared</b></p> <p>2    <b>to be closed more often. Well in actual fact the reason</b></p> <p>3    <b>for that is because it was from July that that procedure</b></p> <p>4    <b>was in place. So pre July you wouldn't have seen that</b></p> <p>5    <b>gate closed. After July it should have been closed</b></p> <p>6    <b>except for the peak periods.</b></p> <p>7    Q. Moving on to the peak periods, we have heard evidence,</p> <p>8    and I believe you may have also heard the same evidence,</p> <p>9    that the gate was left open to allow cars to go in and</p> <p>10   out. You indicated that it should only have been for</p> <p>11   cars going out rather than coming in.</p> <p>12   <b>A. Agreed.</b></p> <p>13   Q. You saw the photo of the chicane and you indicated there</p> <p>14   was another gate --</p> <p>15   <b>A. Yes, with swing arm facilities.</b></p> <p>16   Q. -- which should have been locked. Can we just have</p> <p>17   a look at that, please. It is the first chicane from</p> <p>18   the left?</p> <p>19   <b>A. I believe so, yes.</b></p> <p>20   Q. That is what you say should have been locked?</p> <p>21   <b>A. Yes, yes.</b></p> <p>22   Q. Let us take a situation as occurred here. There was an</p> <p>23   attack on the base, terrorists armed in vehicles are</p> <p>24   heading towards this and this has been left open. That</p> <p>25   would require, wouldn't it, a guard to run about</p> <p style="text-align: center;">Page 200</p>

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<p>1 100 metres from the Gatehouse, out, swing the gate back, 2 lock it and then run back before he is shot? 3 <b>A. Well, apart from a shot part I agree with that</b> 4 <b>statement.</b> 5 Q. So that is not actually really a feasible and effective 6 piece of protection, is it? 7 <b>A. No, which is why we recommended that all parking should</b> 8 <b>be external. Then there's no requirement to open the</b> 9 <b>gate at all.</b> 10 Q. But you also said that the total physical security at 11 this site depended on the SSI and you mentioned manpower 12 more than once? 13 <b>A. Yes.</b> 14 Q. And it was all about manpower? 15 <b>A. Yes, sorry, say that again?</b> 16 Q. If they didn't have sufficient manpower to guard these 17 gates, to close the gates to open them when necessary, 18 the site will be deemed more vulnerable than it already 19 was to an armed attack? 20 <b>A. I wouldn't use the word "sufficient", effective perhaps</b> 21 <b>but not sufficient.</b> 22 Q. You had a mechanism, didn't you, within the civil crisis 23 plan to ask for an increase in the number of guards and 24 discuss with the authorities the requirements for extra 25 police and army protection? Page 201</p>	<p>1 "Discuss with authorities a requirement for extra 2 police and army protection." 3 And by that I guess they mean more the Gendarmes 4 rather than the conventional army? 5 <b>A. Yes.</b> 6 Q. Do you agree with that? 7 <b>A. Yes, the bit that's missing is that you are implying</b> 8 <b>there was a change to medium and therefore we needed an</b> 9 <b>increase in guards and needed to introduce that but --</b> 10 Q. Your risk assessment was at medium? 11 <b>A. Yes.</b> 12 Q. Your operation was low working to medium? 13 <b>A. No.</b> 14 Q. It wasn't? 15 <b>A. No, we were medium. We had always been medium. There</b> 16 <b>has never been a change.</b> 17 Q. Are you sure about that? 18 <b>A. The civil crisis plan alert level is handed down to us</b> 19 <b>in line with BP's. And BP's country assessment for</b> 20 <b>alert level for the civil crisis plan is medium. And so</b> 21 <b>is ours.</b> 22 Q. So if there were weekly liaison and procedure update 23 minutes from around February 2012 up until the date of 24 the attack which indicated that the site was operating 25 at low, working to medium, that would be wrong? Page 203</p>
<p>1 <b>A. I'm sorry, you will have to take me to that in the</b> 2 <b>document.</b> 3 Q. Okay, let's go to that. It is at page 109. It is the 4 green bundle again? 5 <b>A. Which tab?</b> 6 Q. It is tab 13. This is in fact a document which you 7 yourself wrote or certainly contributed to. 8 <b>A. That's correct, yes which page?</b> 9 Q. 149. 10 <b>A. Okay.</b> 11 Q. In fact, we start just to be absolutely fair on the 12 preceding page which is in relation to a medium alert or 13 your risk assessment placed this risk of terrorism 14 within the medium bracket, didn't it? 15 <b>A. Yes, yes.</b> 16 Q. So we have the alert level on the left-hand side, the 17 indicators in the middle. Do you want to take just 18 a few minutes to look at the indicators are or you 19 familiar with it? 20 <b>A. I'm familiar with it if you just take me to the bullet.</b> 21 Q. Of course, page 149. The very last two bullet points at 22 the bottom: 23 "The actions to be effected were increased number of 24 guards." 25 That deals with your manpower situation. Secondly: Page 202</p>	<p>1 <b>A. Yes, that would be an error. It wouldn't be wrong in</b> 2 <b>terms of a physical provision on the ground because as</b> 3 <b>the statement suggests, they were working at medium. So</b> 4 <b>it's a little bit picky because what they were saying at</b> 5 <b>site was that they were operating at medium which is</b> 6 <b>exactly true, and it is just that they made an error</b> 7 <b>inasmuch as they thought they were at low operating at</b> 8 <b>medium. In actual fact they were at medium operating at</b> 9 <b>medium.</b> 10 Q. My question was before we delved into the low to medium 11 was that asking for an increase in guards and liaising 12 and discussing with authorities to get extra police/army 13 protection was precisely what was available to you and 14 the JV if they were operating and when they were 15 operating at medium? 16 <b>A. Okay, to clarify, we had always operated at medium. So</b> 17 <b>we are talking since the inception of the project. So</b> 18 <b>those control measures would have been valid for</b> 19 <b>implementation at the inception of the project and were</b> 20 <b>implemented which is why we did have discussion with</b> 21 <b>police, army and why we had the numbers that were</b> 22 <b>present on site.</b> 23 Q. Mr Wigg, you have told Her Majesty's Coroner both in 24 answer to questions by Ms Dolan and later by me that 25 there was lax security at the site and by that the Page 204</p>

<p>1 checks weren't being carried out as they should have 2 been, the gates were being left open when they shouldn't 3 be and in your witness statement you go even further 4 because when the tent is put up and Tore gets Mr Morgan 5 to go and ask the guards lie to him and you see that as 6 a serious breach? 7 <b>A. That's correct.</b> 8 Q. And you indicated that in order for the effectiveness of 9 SSI guards, manpower was a key issue? 10 <b>A. Yes, and that's -- everything you've said is consistent 11 with the recommendations and the commentary that I wrote 12 in the 4Q security review, where I highlight the 13 shortcomings of the SSI and the effectiveness of it.</b> 14 Q. Mr Wigg, you never, whether yourself or your 15 back-to-back, Mr Butt, who will come to this inquest 16 later, asked for an increased number of guards, did you? 17 <b>A. What we asked for was a change in management and I think 18 you are getting confused, well maybe you are not, but 19 certainly in my opinion the problem with the guards was 20 not the quantity of them, it was how they were 21 operating.</b> 22 Q. You never asked for armed Gendarmes to be at the gate 23 when the swing arm gate is left open, when the external 24 gate is left open and when that entry and exit is the 25 most vulnerable part of the BdV, did you? Page 205</p>	<p>1 MR SHARGHY: So you weren't aware that a truck had driven 2 into the facility passing VCP1, up the road between BdV 3 and the CPF? 4 <b>A. I'm sorry, you have completely lost me now. When was 5 this or what?</b> 6 Q. If you haven't heard of it, Mr Wigg -- 7 <b>A. No, I haven't heard of it.</b> 8 Q. -- you can say you haven't heard of it? 9 <b>A. No, I haven't heard of it.</b> 10 Q. Let us move on to security upgrades. We heard and you 11 were here in court when Mr Popat asked Mr Fitzpatrick 12 about the chicanes. They were put in round about 13 2009/2010, it was described as a major project because 14 it went all the way around, costing millions? 15 <b>A. Agreed.</b> 16 Q. T bar,s, I am sorry. The 3-tonne T bars? 17 <b>A. Yes.</b> 18 Q. There were other recommendations because in line with 19 what you indicated you can't just rely on one piece of 20 security equipment. It is a package? 21 <b>A. Yes.</b> 22 Q. And that package would have included the turnstiles 23 which you have indicated could have been locked, so you 24 can't get entry? 25 <b>A. Mmm.</b> Page 207</p>
<p>1 <b>A. You seemed to have switched from talking about SSI and 2 guards to Gendarmes and armed guards at the gate.</b> 3 Q. Because they are the two penultimate points in your own 4 civil crisis plan. 5 <b>A. I'm sorry, we have just been talking about whether 6 I asked for or whether we should have asked for more SSI 7 guards and now you have switched to we should have asked 8 for Gendarmes.</b> 9 Q. I didn't ask whether. I asked you whether you did ask. 10 If you did ask -- 11 <b>A. Sorry, it is completely different. The Gendarmes we 12 have no control of whatsoever.</b> 13 Q. Did you ask the JV or the business support team or the 14 JOC or their subgroups for either more guards, SSI 15 guards, better quality SSI guards or armed Gendarmes? 16 <b>A. What we did was recommend or pointing out the 17 shortcomings of the SSI and that the SSI needed some 18 continued mentoring and health because they weren't as 19 effective as they should be.</b> 20 THE CORONER: Because if they are no good it doesn't really 21 matter how many you have of them? 22 <b>A. Absolutely and it is worth pointing out before the 23 implementation of the SSI under direction from liaison 24 I can't think of a single security breach that we ever 25 had at In Amenas.</b> Page 206</p>	<p>1 Q. And it would also include the mechanical gate? 2 <b>A. Yes, yes.</b> 3 Q. And when your back-to-back, Gary Butt, produced the 4 second quarter 2012 document can I just ask perhaps it 5 is already been clarified, did you actually see that 6 document and approve it before it went out to the JV? 7 <b>A. Garry's one or?</b> 8 Q. Yes. 9 <b>A. Before he --</b> 10 Q. That is June 2012? 11 <b>A. I didn't see it before he sent it out, no.</b> 12 Q. But did you agree with the contents in terms of what was 13 needed and outstanding? 14 <b>A. Yes, I mean, if you've got something specific then point 15 me to it and I'll give you a direct answer.</b> 16 Q. Okay. Let us go to tab 4 in the green bundle and on 17 page 16 at the bottom you have the second quarter, 18 "Physical security measures"? 19 <b>A. Yes.</b> 20 Q. When Mr Butt was in the process of carrying out the 21 review he came by these outstanding issues which were 22 actually as we can see later on when you carried out the 23 audit outstanding for a number of years? 24 <b>A. Yes.</b> 25 Q. And over the page the top paragraph he says: Page 208</p>

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<p>1 "It is understood that the volume of work activity 2 at site means that resources are scarce and have to be 3 prioritised." 4 However, the review which was to be carried out by 5 a management or JV management and liaison would 6 hopefully close out some of the longstanding items? 7 <b>A. Yes.</b> 8 Q. So your recommendations of the security upgrade, it 9 appears on this view, are being held up because of 10 scarce resources? 11 <b>A. Yes, I mean, it's clear from the tracking document and 12 the SMP that some of the items had been on there for 13 quite some time. It is not for me or Garry to comment 14 on the reasons why --</b> 15 Q. Who would be in the best position to answer that 16 question? 17 <b>A. That would be In Amenas project management.</b> 18 Q. Again, I probably don't need to take up the organogram, 19 but your reporting was to Bill Johnston? 20 <b>A. Correct, yes.</b> 21 Q. Would he be in a better position to say what? 22 <b>A. He may have more insight but ultimately those -- because 23 90 per cent of what we're talking about here is 24 construction. So it would be the construction 25 people/management of construction people that would give</b> Page 209</p>	<p>1 Q. Were you here for Mr Cobb's evidence? 2 <b>A. I caught the tail end, sir, I can't say yes.</b> 3 Q. Mr Cobb said they had armed guards at the entrance. 4 They had a fortified gate, similar to that which you 5 recommended at In Amenas and a large bomb proof safe 6 haven. Would that accord with what you would have seen 7 at the site? 8 <b>A. No, because I was there with a senior manager. We 9 arrived there. We were on the site for about two hours. 10 He had a meeting and then we left.</b> 11 Q. Let us come a bit closer to home. Hassi Messaoud, which 12 is where you were based? 13 <b>A. Yes.</b> 14 Q. That had large fortified walls, didn't it, all the way 15 around the main compound? 16 <b>A. No, no. I think there is a little bit too much detail 17 in this statement. We had a wall, yes. But that wasn't 18 a fortified wall. That was a single skin breeze block 19 wall.</b> 20 Q. You had a fortified gate? 21 <b>A. No, we had steel gates but they weren't fortified.</b> 22 Q. Okay. Steel gates of the type that you had recommended 23 for In Amenas? 24 <b>A. No, completely different. They were sheet steel gates 25 and there was a sliding gate but it wasn't a see through</b> Page 211</p>
<p>1 <b>you the best insight.</b> 2 Q. So the construction of security gates, placing concrete 3 in the sills to fortify the fence, was being put on the 4 back burner in favour of other construction projects 5 that were taking place; is that right? 6 <b>A. I can't comment on that. I don't know the intricate 7 details, what the current work programme was or how 8 things were prioritised.</b> 9 Q. Would you ever repeat your requests regarding the 10 outstanding items or other recommendations security 11 upgrades -- 12 <b>A. Yes.</b> 13 Q. -- other than in these documents? 14 <b>A. Yes. They would be -- I mean bear in mind as I stated 15 earlier, a lot of these upgrades and recommendations 16 date back quite a few years, so we would ask for, and 17 the guys at site, so Paul and Fitz would ask for updates 18 on stuff and we would push things as and when and of 19 course as security risks evolved over time, so VBIED 20 became more prevalent so our focus was on prioritising 21 those measures rather than others for example.</b> 22 Q. Just two very quick areas. Had you ever been to Rhoude 23 El Baguel, REB as we have heard it called? 24 <b>A. I went there once in 2001 or 2002 but I have no 25 recollection of what was there.</b> Page 210</p>	<p>1 <b>gate, a mesh gate if you like. On field locations the 2 preference had always been to use fences and chain link 3 type affairs because it allowed dust and sand to pass 4 straight through it. Otherwise what you get is duning. 5 In Hassi Messaoud, which is an urban environment, it's 6 more prudent to have people not be able to see into your 7 site because you are in an urban environment so it was 8 closed.</b> 9 Q. It had a holding area, didn't it? 10 <b>A. No.</b> 11 Q. It didn't have a holding area? 12 <b>A. No.</b> 13 Q. So any terrorist could drive in without being challenged 14 by armed guards or be stopped by any of the gate 15 features? 16 <b>A. No, I didn't say that. What I said was there was no 17 holding area behind the gate.</b> 18 Q. How would Hassi Messaoud withstand an attack by armed 19 guards in vehicles? 20 <b>A. Hassi Messaoud is a completely different set up. 21 Hassi Messaoud is inside -- have we got an aerial 22 photograph of Hassi Messaoud?</b> 23 Q. No. 24 <b>A. Okay. So Hassi Messaoud is inside a main Sonatrach camp 25 and it's a requirement for all JV partners, so that's</b> Page 212</p>

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<p>1 <b>us, that's Anadarco, that's Gulf Keystone, that is all</b>  2 <b>the other people who have JVs with Sonatrach, have their</b>  3 <b>Hassi Messaoud HQ for want of a better word, BdVs inside</b>  4 <b>that perimeter.</b>  5 Q. How did it withstand an attack or how could it withstand  6 an attack by armed terrorists in a vehicle?  7 <b>A. Well it has the same arrangements as the site. It has</b>  8 <b>a chicane with a lockable arm and then it has a gate</b>  9 <b>same as the other locations.</b>  10 Q. In Salah. The military operated there, didn't they, not  11 the Gendarmes?  12 <b>A. Yes.</b>  13 Q. And that did have the same type of fortified gate that  14 was recommended for In Amenas?  15 <b>A. Yes.</b>  16 Q. And that had been in place for a number of years, hadn't  17 it?  18 <b>A. Yes, I mean In Salah was, you have to take this into</b>  19 <b>context, I don't know how much insight people have had</b>  20 <b>into In Salah. But In Salah was effectively four</b>  21 <b>In Amenases in four different locations.</b>  22 Q. It still had the same security features that you were  23 recommending for In Amenas?  24 <b>A. Yes.</b>  25 Q. And just the final point, having made the</p> <p style="text-align: center;">Page 213</p>	<p>1 <b>I wrote for a contractor who is coming to work for us.</b>  2 <b>So this gave them some insight into what was on site;</b>  3 <b>what our general philosophy was and what our</b>  4 <b>expectations of that contractor were.</b>  5 Q. So that was your mission statement as liaison?  6 <b>A. No, that's a mission statement of security on the</b>  7 <b>project. There's a distinct difference between liaison</b>  8 <b>and what's approved by the JV.</b>  9 Q. Your recommendations which were not being implemented,  10 having been agreed, left a gap, didn't it, in the site  11 security at the BdV because it allowed armed men in  12 vehicles to drive past unarmed guards, open gates, take  13 hostages?  14 <b>A. Yes, that gap was present.</b>  15 Q. And therefore, security of personnel at the BdV could  16 not be guaranteed without those upgrades being put into  17 place?  18 <b>A. As I said earlier, the system that was in place relied</b>  19 <b>heavily on the SSI guards carrying out their job 100 per</b>  20 <b>cent correct, and as I have noted there were gaps in</b>  21 <b>their performance which were highlighted to management</b>  22 <b>and, you know.</b>  23 Q. So therefore, that gap meant that security could not be  24 guaranteed at the site unless and until SSI effectively  25 put in more robust staff and the JV put in the upgrades</p> <p style="text-align: center;">Page 215</p>
<p>1 recommendations to the JV, having had them approved but  2 not yet put in place your mission, as part of liaison,  3 this is in the document I can take you to, back in 2009?  4 <b>A. Okay, if you could.</b>  5 Q. It is tab 21, page 227 of the green bundle. It is  6 a liaison philosophy, strategy and definitions. This is  7 a document dated September 2009.  8 <b>A. Okay, yes. Sorry, no, I'm looking at something</b>  9 <b>different here.</b>  10 Q. Tab 21?  11 <b>A. Yes, I have got 21. I have got 227.</b>  12 Q. Page 227.  13 <b>A. I am looking at -- yes, sorry, yes.</b>  14 Q. This is the liaison SOR for In Amenas Compression  15 Project, dating back to 2009?  16 <b>A. That's correct, yes.</b>  17 Q. And the key purpose was to provide personnel systems to  18 protect people, property and premises and as one of its  19 primary roles, the protection of life?  20 <b>A. Yes.</b>  21 Q. Your recommendations of that which was approved it was  22 really there for the protection of life. Steel gates,  23 the turnstiles?  24 <b>A. Okay, just to bring this into context. The document you</b>  25 <b>are referring to is a statement of requirements which</b></p> <p style="text-align: center;">Page 214</p>	<p>1 which you recommended?  2 <b>A. Well, that's more of an "or" rather than an "and".</b>  3 MR SHARGHY: Thank you.  4 Questions from MR OWEN-THOMAS  5 MR OWEN-THOMAS: Mr Wigg, my name is Owen-Thomas and  6 I represent David Green, the father of Stephen Green.  7 Just while you have the picture up on the screen, very  8 quickly, if the swing gate and the sliding gate are left  9 open the security of that chicane is inadequate, isn't  10 it?  11 <b>A. It's compromised.</b>  12 Q. If you were told by the JV we are taking out the swing  13 gate and taking out the sliding gate you would have said  14 that security is inadequate?  15 <b>A. We would have made recommendations as we had about --</b>  16 <b>the arrangements that are in place but that they needed</b>  17 <b>improving.</b>  18 Q. There is nothing in your witness statement about your  19 background. May I ask you very briefly, is it  20 a military background?  21 <b>A. Yes. Eight years military service followed by four</b>  22 <b>years at university, followed by five or six years doing</b>  23 <b>safety work, working at height, and I have been in</b>  24 <b>Algeria doing this kind of work for 15 years.</b>  25 Q. Military experience in the UK?</p> <p style="text-align: center;">Page 216</p>

<p>1 <b>A. Yes, Parachute Regiment.</b></p> <p>2 Q. And currently do you still work for AFMC?</p> <p>3 <b>A. No.</b></p> <p>4 Q. Can I ask you this: you have been asked about the safe</p> <p>5 haven that was constructed at a site elsewhere, REB?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. Did you ever suggest such a site be built at In Amenas?</p> <p>8 <b>A. We didn't suggest it. We reviewed the idea. It's not</b></p> <p>9 <b>uncommon to have safe havens. The challenges we faced</b></p> <p>10 <b>with a safe haven solution or addition at In Amenas was</b></p> <p>11 <b>that we had over 500 staff and it's both Statoil, BP and</b></p> <p>12 <b>Sonatrach's, you know, MO, if you like, that we don't</b></p> <p>13 <b>discriminate. So to make a safe haven you would have to</b></p> <p>14 <b>make one big enough for 500 people or several that would</b></p> <p>15 <b>accommodate 500 people and I'm sure you can imagine the</b></p> <p>16 <b>logistics involved in that and of course the purpose of</b></p> <p>17 <b>those safe havens being compromised during the time it</b></p> <p>18 <b>would take to get 500 people into safe havens.</b></p> <p>19 Q. I don't understand the logistics of it. They could have</p> <p>20 been built?</p> <p>21 <b>A. Well, okay. So let me clarify the logistics of it. You</b></p> <p>22 <b>have got 500 odd people in a camp. You may have</b></p> <p>23 <b>a single safe haven or you may have a number. An alarm</b></p> <p>24 <b>goes off and you have 500 people running round a camp</b></p> <p>25 <b>trying to find their way to safe havens while you have</b></p> <p style="text-align: center;">Page 217</p>	<p>1 <b>one or two captains, very briefly, with Paul. I'd go</b></p> <p>2 <b>down to visit site and occasionally I might go and have</b></p> <p>3 <b>a chat with the captain with Paul.</b></p> <p>4 Q. Did you form any independent assessment as to their</p> <p>5 capability?</p> <p>6 <b>A. No.</b></p> <p>7 Q. Did you form any independent view as to numbers that</p> <p>8 were there in the camp?</p> <p>9 <b>A. Yes, certainly. You know, it's natural for you to know</b></p> <p>10 <b>how many military are there and make a rule of thumb</b></p> <p>11 <b>assessment. The way I would look at it that is I'd look</b></p> <p>12 <b>at Hassi R'Mel. We have got a gas plant there. Teg,</b></p> <p>13 <b>Reg, Krechba, which are all ISG sites, Southern fields,</b></p> <p>14 <b>which is obviously a multi billion dollar project.</b></p> <p>15 <b>I look at how many military are protecting those and</b></p> <p>16 <b>then you draw a comparison with what has been provided</b></p> <p>17 <b>to you at In Amenas. So in ISG typically I think in Reg</b></p> <p>18 <b>we had just under 100 military. Kretchpa we had just</b></p> <p>19 <b>under 100 military. Teg we had 50 or 60 but there was</b></p> <p>20 <b>a bigger camp remote from us there. Southern Fields,</b></p> <p>21 <b>which is a huge construction project, I think we had</b></p> <p>22 <b>about 120 to start and when I look at In Amenas with 160</b></p> <p>23 <b>I see that was nearly 30, 40 per cent more than ISG</b></p> <p>24 <b>sites.</b></p> <p>25 Q. But did you form the assessment yourself that there were</p> <p style="text-align: center;">Page 219</p>
<p>1 <b>got terrorists running around the camp with weapons.</b></p> <p>2 <b>Our preference was it is more practical to tell people</b></p> <p>3 <b>to stay put and hide than it is to have people running</b></p> <p>4 <b>around while there's potentially bullets being fired.</b></p> <p>5 Q. What protection does someone hiding under their bed have</p> <p>6 from terrorists who enters into their camp?</p> <p>7 <b>A. Very little.</b></p> <p>8 Q. None at all, is there?</p> <p>9 <b>A. No.</b></p> <p>10 Q. Nearly everyone involved in this attack it seems</p> <p>11 followed the orders to get under their bed and stay put?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. When you were making recommendations did you give any</p> <p>14 consideration to the cost of those recommendations?</p> <p>15 <b>A. No, no.</b></p> <p>16 Q. So if you thought it was necessary you recommended it</p> <p>17 and it was for others to decide whether it was</p> <p>18 cost-effective?</p> <p>19 <b>A. Absolutely and more often than not if the JOC saw merit</b></p> <p>20 <b>in it they would support it. Electronic access control</b></p> <p>21 <b>was a good example. They went to great expense to buy</b></p> <p>22 <b>that system and T bars was another that cost millions.</b></p> <p>23 Q. Did you yourself have any contact with the Gendarmes at</p> <p>24 the In Amenas site?</p> <p>25 <b>A. I met with a number of -- not a number but I met with</b></p> <p style="text-align: center;">Page 218</p>	<p>1 160 Gendarmes there?</p> <p>2 <b>A. I don't follow.</b></p> <p>3 Q. Well, when you went did you think this looks like there</p> <p>4 are 160 odd Gendarmes here?</p> <p>5 <b>A. It is difficult to tell because they are all out</b></p> <p>6 <b>working. Some are sleeping. The ones that aren't</b></p> <p>7 <b>working they're normally sleeping. Their job is not to</b></p> <p>8 <b>be 160 guys in that camp. You'd expect to see the guys</b></p> <p>9 <b>working nights in beds so you don't see them and the</b></p> <p>10 <b>ones that are there during the day you'd expect to see</b></p> <p>11 <b>out and about. So it's very difficult to say there are</b></p> <p>12 <b>160 people there.</b></p> <p>13 Q. What is it? I mean back in the Parachute Regiment you</p> <p>14 would have want walked into somewhere and seen however</p> <p>15 many people milling around and I expect you could have</p> <p>16 seen whether this was a platoon, a company or</p> <p>17 a batallion or a brigade?</p> <p>18 <b>A. It was much bigger than company strength.</b></p> <p>19 Q. Just finally, something from Mr Collins's evidence about</p> <p>20 your role in intelligence gathering. Can I just very</p> <p>21 quickly read you this. It was asked of Mr Collins</p> <p>22 whether he had any intelligence gathering function and</p> <p>23 what he said was:</p> <p>24 "There were two liaison supervisors in Algiers and</p> <p>25 a liaison manager. So they would report up to a liaison</p> <p style="text-align: center;">Page 220</p>

55 (Pages 217 to 220)

<p>1 manager and they reported to the security manager for                  2 Algeria. They indeed had -- part of their role was to                  3 gather intelligence locally and regionally and pull that                  4 information together to assist in our constant risk                  5 analysis."                  6 Is that right? Do you say there was an intelligence                  7 gathering function to the liaison team?                  8 <b>A. I think that's maybe overstating the role but, yes, we</b>                  9 <b>depended, they were the guys who produced WSRs that came</b>                  10 <b>out weekly.</b>                  11 Q. When you say "they were the guys" who did that? Who are                  12 you talking about?                  13 <b>A. The liaison managers in Algiers. Formerly there were</b>                  14 <b>a number of posts in Algiers but they grew and</b>                  15 <b>contracted according to workload but the function of</b>                  16 <b>somebody in Algiers who would maintain contact with</b>                  17 <b>FCOs, embassies, would collate open source information</b>                  18 <b>from newspapers and form a round up, if you like, of</b>                  19 <b>security events, and threats, if you like, on a weekly</b>                  20 <b>basis was there, yes.</b>                  21 <b>MR OWEN-THOMAS: Thank you, Mr Wigg, that is all I have.</b>                  22 <b>Questions from MS GERRY</b>                  23 MS GERRY: Mr Wigg, I am going to ask you questions on                  24 behalf of the family of Sebastian John. Can I take it                  25 that your back-to-back, Mr Butt, does almost exactly the</p> <p style="text-align: center;">Page 221</p>	<p>1 <b>government authorities for approval to demonstrate to</b>                  2 <b>the Algerian government that you are taking reasonable</b>                  3 <b>care of yourselves.</b>                  4 Q. Mr Wigg, I have asked some questions about the decrees                  5 that came from -- the Algerian laws, the decrees I think                  6 or rulings they are called, about what is required and                  7 as I understand from that there was a requirement to                  8 submit to the local Wali a report for that to be or                  9 a plan for that to be agreed to?                  10 <b>A. Yes.</b>                  11 Q. Is that what you are referring to?                  12 <b>A. Yes.</b>                  13 Q. At page 13 of your statement -- sorry, just to finish.                  14 Can I ignore the PSI in terms of what the actual                  15 internal security management plan was?                  16 <b>A. Sorry, I missed that.</b>                  17 Q. Can I just ignore the PSI in terms of what the internal                  18 risk management plan was? If we haven't seen it is it                  19 something you ought to see or something we need not                  20 worry about?                  21 <b>A. I would suggest it is something you don't need to worry</b>                  22 <b>yourselves about.</b>                  23 Q. Can I ask you then to go to page 13. It is page 13 of                  24 the core bundle where there is reference to -- there is                  25 reference there to the district security commission?</p> <p style="text-align: center;">Page 223</p>
<p>1 same role as you did?                  2 <b>A. Absolutely.</b>                  3 Q. And he was the actual author of the December 2012                  4 document?                  5 <b>A. No, that was me.</b>                  6 Q. That was you. There are some questions I am going to                  7 wait and ask Mr Butt. Can I just ask you, do you have                  8 your witness statement in front of you?                  9 <b>A. I haven't, but go ahead.</b>                  10 Q. Page 3 of your witness statement. And it is about the                  11 plan change. So it is a paragraph in between the two                  12 holepunches you said:                  13 "The new reporting procedure was that the SSI would                  14 report to the ASI "                  15 Do you see that?                  16 <b>A. Yes, I can.</b>                  17 Q. You then go on and say that:                  18 "The ASI would produce a Plan Surete Interne which                  19 replaced our Security Management Plan."                  20 I am not sure, are you aware whether we have seen                  21 the PSI?                  22 <b>A. I don't know whether you have seen it. I am not</b>                  23 <b>100 per cent correct there to be honest. The PSI is</b>                  24 <b>a requirement, a statute requirement and effectively is</b>                  25 <b>a security plan that has to be submitted to the local</b></p> <p style="text-align: center;">Page 222</p>	<p>1 <b>A. Sorry.</b>                  2 Q. Do you know what that is?                  3 <b>A. I'm lost now, where am I looking?</b>                  4 Q. Can I just ask before I take you there, do you know what                  5 the district security commission was?                  6 <b>A. You may be -- there is a commission at Wali level which</b>                  7 <b>considers the appropriate security that should be</b>                  8 <b>attributed to projects. It has been referred to as many</b>                  9 <b>different things but effectively it is the Wali who is</b>                  10 <b>the governor of the region which I have heard you</b>                  11 <b>discuss previously. He'll have the head of the</b>                  12 <b>Gendarmes for the region, he'll have the head of the</b>                  13 <b>military for the region, he'll have the head of police</b>                  14 <b>for the region and it will have government</b>                  15 <b>representatives there and they'll sit around together</b>                  16 <b>and say: what is this project? Who's working there,</b>                  17 <b>what's the nature of it? What is the value of it to the</b>                  18 <b>country, the C&amp;I value et cetera and then they'll say</b>                  19 <b>okay, we need to do X, Y and Z and between them that</b>                  20 <b>Security Council will decide who is going to provide the</b>                  21 <b>protection numbers and so on.</b>                  22 Q. Can I then ask you to look at the core bundle, tab 3?                  23 <b>A. That is the green one isn't it?</b>                  24 Q. That is the green one.                  25 <b>A. Tab 3?</b></p> <p style="text-align: center;">Page 224</p>



<p>1 Q. Yes. And there you should find the letter or the memo 2 of 12 December?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. I can see that it is in French first of all and there is 5 a translation, use whatever you find more comfortable 6 but it suggests at the beginning, it says: 7 "The minutes of the district security commissions 8 report the involvement of expatriate managers in the 9 management of internal security which is contrary to the 10 current regulations in force, in particular 11 regarding..."</p> <p>12 And it goes on. So just to be clear, this is coming 13 from the body of people made up in the way that you have 14 indicated?</p> <p>15 <b>A. Yes, so this is --</b></p> <p>16 Q. They would have met -- sorry, go on.</p> <p>17 <b>A. So the way that council would communicate with us, for 18 example, would be via Sonatrach. Sonatrach is the 19 national oil company. We as a project or as individuals 20 would have no direct contact with that organisation. 21 Their mechanism for telling us what to do if you like 22 would be via Sonatrach and so these faxes and these 23 directives although quite often they're either from the 24 military or from governmental sources they're 25 letterheaded Sonatrach.</b></p> <p style="text-align: center;">Page 225</p>	<p>1 investigate.</p> <p>2 Can I just ask you then about Papa Charlie?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. As I understand it Papa Charlie had a role of monitoring 5 or being in control of the radio system?</p> <p>6 <b>A. Yes, he was the radio operator. So he was the central 7 point if you like. He was present 24/7 and he 8 coordinated traffic if you like over the radio.</b></p> <p>9 Q. But it was also his role, wasn't it, there were 10 instructions to guards if they saw something of concern 11 to radio in to Papa Charlie?</p> <p>12 <b>A. Yes, Papa Charlie provided that 24/7 contact, that 13 anybody on site could have used to raise an alarm or air 14 a concern, it could be as simple as I'm 15 kilometres 15 from a well site with the military and I have a flat 16 tyre and I need help.</b></p> <p>17 Q. Or it could be as serious as terrorists are approaching?</p> <p>18 <b>A. Absolutely.</b></p> <p>19 Q. Can I just ask you to indicate on the living area, the 20 big map we have and I have forgotten what the number is, 21 where Papa Charlie was being located?</p> <p>22 <b>A. Yes, I think -- so it's not annotated but it's, if you 23 go across to where it says 50 Man office?</b></p> <p>24 Q. I think we had this indicated before so you have the two 25 oblong buildings behind it and then the building next to</p> <p style="text-align: center;">Page 227</p>
<p>1 Q. I assume that it is right that the JV had to abide by 2 a direction that came from the district security 3 commission?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. We heard evidence last week about a security person at 6 Hassi Messaoud saying that "be careful what you put in 7 emails because they're being read." You were obviously 8 at Hassi Messaoud, is that something you heard at all?</p> <p>9 <b>A. No, it's not something that I'm aware of being some kind 10 of endemic problem, no.</b></p> <p>11 Q. Were you aware of it being a problem at all or it ever 12 being raised or discussed?</p> <p>13 <b>A. I had heard rumours -- this is during the strikes -- 14 I had heard rumours during the strikes that some of the 15 emails were being read and that some staff were using 16 their parent company email accounts rather than JV ones, 17 so we had statoil.com or bp.com addresses rather than JV 18 ones but I'm not sure, and I'm certainly not aware of 19 any conclusion to whether that actually was happening or 20 not.</b></p> <p>21 Q. Was the security around the use of the emails and the IT 22 system something that fell within the liaison team or 23 were you purely to do with physical security?</p> <p>24 <b>A. No, we had nothing whatsoever to do with information.</b></p> <p>25 Q. So if you heard those rumours it wasn't for you to</p> <p style="text-align: center;">Page 226</p>	<p>1 that?</p> <p>2 <b>A. Exactly.</b></p> <p>3 Q. Was the CCTV in there as well?</p> <p>4 <b>A. No, not to my knowledge.</b></p> <p>5 Q. So Papa Charlie wasn't located in the same place as the 6 CCTV monitors?</p> <p>7 <b>A. No.</b></p> <p>8 Q. So in that building was just the radio control room, is 9 that right?</p> <p>10 <b>A. No, there are a number of functions in there. The radio 11 operator's office is next door to the liaison 12 supervisor.</b></p> <p>13 Q. Who was Papa Charlie, not first of all the particular 14 person but who fulfilled that role?</p> <p>15 <b>A. Okay, so he was an Algerian national that was trained by 16 us, liaison, whose requirements were that he spoke 17 fluent English, fluent French, fluent Arabic.</b></p> <p>18 Q. Was it a dedicated role or was it a role that was 19 performed by some of the security guards on a rotational 20 basis?</p> <p>21 <b>A. No, it was a dedicated role.</b></p> <p>22 Q. How many Papa Charlies were there?</p> <p>23 <b>A. It was 24/7 so there was one day, one night and then 24 they worked back-to-back, so four of them.</b></p> <p>25 Q. Do you know who was Papa Charlie on 16 January?</p> <p style="text-align: center;">Page 228</p>

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<p>1 <b>A. No.</b></p> <p>2 Q. Is there a way of finding that out?</p> <p>3 <b>A. Yes, that would be on the staff rosters which I don't</b></p> <p>4 <b>have access to, but I'm sure the project could find that</b></p> <p>5 <b>for you.</b></p> <p>6 Q. And presumably, I have referred to people contacting</p> <p>7 Papa Charlie if they are alerted to a security</p> <p>8 situation, that presumably would apply to guards on</p> <p>9 VCP1. If the guards on VCP1 would have radios they</p> <p>10 would be able to alert Papa Charlie if there was</p> <p>11 a terrorist attack?</p> <p>12 <b>A. The guards on VCP1 would do a number of things</b></p> <p>13 <b>concurrently.</b></p> <p>14 Q. Time is short so just specifically if a guard on VCP1</p> <p>15 saw terrorists approaching if they could they would</p> <p>16 radio Papa Charlie?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. Were you aware or have you become aware of anyone</p> <p>19 calling Papa Charlie on the early stages of the 16th?</p> <p>20 <b>A. I'm not. But then I wouldn't be. Bear in mind the only</b></p> <p>21 <b>contact we had with site on the morning of the 16th was</b></p> <p>22 <b>the initial conversations with Yann which I summarised</b></p> <p>23 <b>and any text messages or calls from other people that</b></p> <p>24 <b>were hiding.</b></p> <p>25 Q. And another role of Papa Charlie as I understand it is</p> <p style="text-align: center;">Page 229</p>	<p>1 <b>A. No, it's my understanding the liaison guys and obviously</b></p> <p>2 <b>the SSI remained on site throughout. I think. I can't</b></p> <p>3 <b>recollect exactly to be honest.</b></p> <p>4 Q. Can I just put Lotfi's statement to you. So this is</p> <p>5 Lotfi Benadouda in his statement at page 2 going over to</p> <p>6 page 3. You don't need to take it up. I will just read</p> <p>7 it?</p> <p>8 <b>A. Okay.</b></p> <p>9 Q. He says:</p> <p>10 "We decided to demobilise expats at the site and</p> <p>11 move them to Hassi Messaoud. Only keeping the minimum</p> <p>12 level of staff at the site including plant workers, HSE</p> <p>13 and security all other project people moved to</p> <p>14 Hassi Messaoud."</p> <p>15 So security did remain on site, sorry.</p> <p>16 My final question is about hostage negotiation. Did</p> <p>17 you understand it to be the position of the Algerian</p> <p>18 authorities that they would not negotiate with</p> <p>19 terrorists over hostages?</p> <p>20 <b>A. Honestly I can't comment on what their position or what</b></p> <p>21 <b>their posture would have been in terms of or what their</b></p> <p>22 <b>policy was to be honest.</b></p> <p>23 Q. Were you ever given or did you ever recommend people</p> <p>24 given hostage negotiation skills training?</p> <p>25 <b>A. No, no. You know, we were, as I stated earlier,</b></p> <p style="text-align: center;">Page 231</p>
<p>1 when the bus convoy leaves to go to the airport they</p> <p>2 would radio into Papa Charlie saying they are leaving</p> <p>3 and in fact we have evidence that that happened on this</p> <p>4 occasion, that Papa Charlie was contacted, we will have</p> <p>5 that evidence, when they left. Was it also</p> <p>6 a requirement for when they passed through VCP1 that</p> <p>7 they radio back to Papa Charlie and say, "We are clear</p> <p>8 of VCP1 and we are now on our way to La Recule"?</p> <p>9 <b>A. To be honest I can't really answer that with</b></p> <p>10 <b>100 per cent confidence because it is a local procedure</b></p> <p>11 <b>if you like, I don't know every line item of the SOP</b></p> <p>12 <b>standard.</b></p> <p>13 Q. Just in relation to the CCTV, as I understand it there</p> <p>14 was no CCTV at VCP1 or VCP2?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Was there a reason for that?</p> <p>17 <b>A. Off the top of my head I can't think of a reason why it</b></p> <p>18 <b>wasn't there. No, I don't know, no.</b></p> <p>19 Q. Just turning then to the demobilisation that happened</p> <p>20 when the drivers strike was on. As I understand it,</p> <p>21 there is only minimum staff left in In Amenas and all</p> <p>22 expat staff were moved to Hassi Messaoud. I think they</p> <p>23 returned 3 or 4 weeks before this incident so once the</p> <p>24 drivers strike ended in December. That included</p> <p>25 security, expat security being moved to Hassi Messaoud?</p> <p style="text-align: center;">Page 230</p>	<p>1 <b>a tactical level implementation of the security</b></p> <p>2 <b>management plan. We didn't go into strategic or</b></p> <p>3 <b>planning about what would happen, let's train people for</b></p> <p>4 <b>this.</b></p> <p>5 Q. The reason I ask and this is absolutely no criticism is</p> <p>6 obviously you referred to recommending, I can't remember</p> <p>7 who was on the phone at the time, to the person who took</p> <p>8 the phone call from the terrorists, tell them we'll get</p> <p>9 back to them and we will report it up?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. You were getting phone calls to your offices from the</p> <p>12 terrorists?</p> <p>13 <b>A. We had one.</b></p> <p>14 Q. Okay, you had one and the way you dealt with that was</p> <p>15 how you decided to deal it at the time and wasn't based</p> <p>16 on any training?</p> <p>17 <b>A. It was based on training from a previous life, yes.</b></p> <p>18 MS GERRY: Okay, but not in that role. Thank you.</p> <p>19 Questions from MS GOLLOP</p> <p>20 MS GOLLOP: I am asking questions on behalf of Belinda</p> <p>21 Green, Stephen Green's widow.</p> <p>22 Have you been interviewed by the Algerians over the</p> <p>23 In Amenas attack at all?</p> <p>24 <b>A. No, no.</b></p> <p>25 Q. Do you happen to know if they are investigating what</p> <p style="text-align: center;">Page 232</p>

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1 happened at all?  
 2 **A. I only know what I read in the press which is that**  
 3 **there's an investigation ongoing.**  
 4 Q. Which sort of press is that?  
 5 **A. Algerian press, but this is -- I'm going back to post**  
 6 **incident where there was the generic --**  
 7 Q. In the aftermath?  
 8 **A. Yes.**  
 9 Q. Have you been interviewed by Statoil?  
 10 **A. No.**  
 11 Q. Have you been interviewed by BP?  
 12 **A. No.**  
 13 Q. Have you seen the Statoil report?  
 14 **A. Yes.**  
 15 Q. You were sent it by somebody?  
 16 **A. No, I downloaded it off their website.**  
 17 Q. Have you been back to the site since the attack?  
 18 **A. No.**  
 19 Q. Can I ask you about Barry Shaw. As I understand the  
 20 suggestion from one of the witness statements you two  
 21 know each other from military background possibly?  
 22 **A. No.**  
 23 Q. Or do you have any background in common?  
 24 **A. No.**  
 25 Q. Did you talk to him about the attack and what went  
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1 wrong?  
 2 **A. We've had broad discussions, yes.**  
 3 Q. Reach any educated guesses?  
 4 **A. No, apart from the obvious stated facts which are that**  
 5 **terrorists have managed to turn up at our doorstep and**  
 6 **managed to drive into our camps.**  
 7 Q. I wanted to ask you about one thing that you wrote  
 8 in the December 2013 document which I think is in core  
 9 bundle. I think it is going to be the green one.  
 10 **A. Okay, got that.**  
 11 Q. Give it a go. Tab 11. Security management plan?  
 12 **A. Got it.**  
 13 Q. Page 94.  
 14 **A. Yes.**  
 15 Q. This is your document?  
 16 **A. This is the last update that I did of it, yes.**  
 17 Q. Under -- two thirds of the way down under the subheading  
 18 "Security management". If you skip that top paragraph  
 19 then you have the sentence that says:  
 20 "Both the liaison department and SSI aim to operate  
 21 in harmony and in mutual support with each other in  
 22 order to provide the JV with a holistic and  
 23 comprehensive security system."  
 24 Is the most important word in that sentence "aim"?  
 25 **A. Yes.**  
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1 Q. It is an aspiration rather than something that had been  
 2 achieved?  
 3 **A. I think aspiration is stretching it. Certainly at the**  
 4 **inception of the SSI there were a number of problems**  
 5 **which I highlighted myself in that update of the SSI but**  
 6 **as I point out in there also that they've made quite**  
 7 **a bit of progress in terms of relationship and working**  
 8 **holistically with the SSI in the months preceding the**  
 9 **attack. So it started out not so good. We had made**  
 10 **a lot of improvements and it was work in progress.**  
 11 Q. Mr Fitzpatrick gave us evidence earlier that he felt  
 12 that by the end of the year certainly relationships with  
 13 the managers had improved?  
 14 **A. When you say managers are you talking about the ASIs,**  
 15 **the managers of the --**  
 16 Q. Yes.  
 17 **A. Yes, they had, yes.**  
 18 Q. What about the performance of the boots on the ground as  
 19 it were, were they still fairly incompetent?  
 20 **A. I think incompetent is stretching it. I think**  
 21 **inconsistent is probably more appropriate. But**  
 22 **inconsistency had been improved upon if you like. They**  
 23 **were less inconsistent than they were when they were**  
 24 **initially changed over management.**  
 25 Q. As I understand it, there is still a situation in which  
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1 you have two different lines of reporting so another  
 2 thing Mr Fitzpatrick said if one of the ASIs wants to  
 3 report something up to Sonatrach and cut me out of the  
 4 loop there is nothing I can do about it. Agreed?  
 5 **A. Yes.**  
 6 Q. So one of the sort of systemic problems that you got  
 7 with the whole JV set up is that although it is called  
 8 a JV you have actually got three companies operating  
 9 separately, haven't you?  
 10 **A. I wouldn't say -- it is not as simple as that. There is**  
 11 **an operating side to it and then there is a reporting**  
 12 **side to it. So whilst the ASI may report independently**  
 13 **to Sonatrach he is still operating under local**  
 14 **management. So in the latter half of 2012 the issue to**  
 15 **which you refer was directly addressed by Lotfi. At the**  
 16 **inception of the SSI the ASI was bound to report**  
 17 **directly to Algiers and to a security manager completely**  
 18 **independent of the JV. That was identified as a gap and**  
 19 **both Mark Cobb and Lotfi identified that as a gap or**  
 20 **then recognised it as a gap once we raised it and they**  
 21 **addressed it so the ASI then had to report directly to**  
 22 **Lotfi on site as the senior Sonatrach manager for all**  
 23 **things operational while he still maintained an indirect**  
 24 **report, if you like, to Sonatrach Algiers.**  
 25 Q. So did you feel that by the end of 2012 it was operating  
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1 in an integrated and holistic way?  
2 **A. We had made improvements but there were still further**  
3 **improvements to make.**  
4 Q. I would like to ask you about the Statoil report if  
5 I may just a bit since you have read it. Core bundle 2,  
6 I'm not sure what colour that is.  
7 **A. Am I still in the green folder or am I .**  
8 Q. In the red one. Tab 8.  
9 **A. Okay.**  
10 Q. I just wanted to run over a couple of things with you.  
11 Have a look at page 396?  
12 **A. Okay.**  
13 Q. Under the paragraph 6.1 "Regional security developments"  
14 if you skip the first two paragraphs just above where  
15 the bullet points start it says:  
16 "In the period preceding the attack against  
17 In Amenas several events suggested a change in external  
18 security environment."  
19 And then it goes on to outline those five points?  
20 **A. Yes.**  
21 Q. All of which is liaison function you will have had well  
22 in mind as they arose?  
23 **A. I was aware of every one of those bullet points, yes.**  
24 Q. Then if we turn on to page 411?  
25 **A. Yes.**

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1 Q. I just wanted your view on this. It says at 8.5,  
2 towards the bottom:  
3 "Security."  
4 If you skip the top paragraph it says:  
5 "At In Amenas inner physical security measures were  
6 not constructed to withstand or delay an armed assault."  
7 Comment, thoughts?  
8 **A. Yes, certainly. If you take the sum total of what was**  
9 **in place, what had been agreed by the JOC to put in**  
10 **place plus the recommendations that we put forward in**  
11 **the months and years preceding the attack, what you come**  
12 **out with is pretty much exactly what the accepted**  
13 **recommendations had been for upgrades post incident. So**  
14 **the sum total of what was recommended and most of which**  
15 **would have been accepted had it been implemented on time**  
16 **or pre-attack it will have been equal or pretty much**  
17 **equal, give or take one or two bullets to what has been**  
18 **accepted post incident for implementation. Does that**  
19 **make sense?**  
20 Q. I think so. Another way of putting that is what they  
21 are doing now is what you recommended they should have  
22 done before the attack?  
23 **A. That we were part way through doing.**  
24 Q. So just to be absolutely clear about this, and looking  
25 just particularly at that sentence, tell me if I have

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1 this right, what you are saying is that if everything  
2 that had been recommended had been done then the inner  
3 physical security measures would have been constructed  
4 to withstand or delay an armed assault?  
5 **A. Yes.**  
6 Q. But as it was, at the point of construction that had  
7 been reached they were not adequate to that task?  
8 **A. No, I didn't say that. As I pointed out in the security**  
9 **management plan, they were adequate but they relied**  
10 **heavily on the manpower at site performing as they**  
11 **should every minute of every day. Whereas the sum total**  
12 **of the recommendations reduced that reliance on the**  
13 **manpower to be 100 per cent.**  
14 Q. Okay. This is me being slow I am sure, but this  
15 I haven't personally quite understood. When we look at  
16 the actual attack that happened, the way they drove  
17 through the chicane and then drove through the gap where  
18 there should have been a large bus but wasn't and then  
19 drove up the whole stretch where there should have been  
20 lots of vehicles but somehow just weren't and then drove  
21 through the gate that was supposed to be a barrier but  
22 somehow wasn't, it wasn't adequate but more importantly,  
23 it didn't rely on manpower?  
24 **A. No.**  
25 Q. It relied on physical objects?

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1 **A. Okay. So the recommendation in place was that vehicles**  
2 **should all be parked externally and the gate and the**  
3 **chicane remain permanently locked. Now that wasn't JOC**  
4 **approved for the BdV but it was JOC approved for the CPF**  
5 **and IBO.**  
6 Q. But it wasn't for the BdV?  
7 **A. The BdV preferred to have what they described as -- this**  
8 **is JOC not liaison -- what they described as an outer**  
9 **inner parking area, which is what you see. So you come**  
10 **in the external perimeter and there is a car park and**  
11 **there is another gate to get through. So what our**  
12 **recommendation was that that outer protection should be**  
13 **at the entrance to BdV not at the entrance to the car**  
14 **park, if that makes sense.**  
15 Q. That does make sense. If we just focus on that because  
16 it is obviously much more important to focus on what  
17 actually happened where it actually happened rather than  
18 a hypothetical different attack. The actual BdV where  
19 they drove in there, not the CPF or anywhere else, just  
20 focusing on that. I don't want to push you so you tell  
21 me if I have this right?  
22 **A. Yes, go ahead.**  
23 Q. It wasn't constructed to withstand or delay an armed  
24 assault, was it?  
25 **A. No.**

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<p>1 MS GOLLOP: Thank you. 2 Questions from MR FLINN 3 MR FLINN: Mr Wigg, my name is Matthew Flinn, I ask 4 questions on behalf of the families of Garry Barlow, 5 Carson Bilsland, Paul Morgan and Kenneth Whiteside. 6 You made a distinction before in answering a 7 question from Ms Gollop about reporting lines and 8 operations. I think you said that guards might report 9 to ASI and then on to Sonatrach but from an operational 10 perspective when guards were carrying out their tasks 11 they were operating on behalf of the JV. Is that a fair 12 summary of what you were saying? 13 <b>A. They were operating -- it's a little bit more subtle 14 than that. They worked for Sonatrach so they abide by 15 Sonatrach rules and Sonatrach governs even though they 16 are working at the JV site.</b> 17 Q. Security management plan. You have explained that it 18 tracked the implementation of approved recommendations 19 for physical security measures. Firstly, can you recall 20 making any recommendations that were not approved? 21 <b>A. The one, I suppose the principal one that wasn't was the 22 one we have just discussed with Ms Gollop.</b> 23 Q. Not locking the -- 24 <b>A. About the closing gates and external parking.</b> 25 Q. At the BdV?</p> <p style="text-align: center;">Page 241</p>	<p>1 <b>A. No.</b> 2 Q. Implementation of approved measures. That wasn't 3 a liaison responsibility. That was a JV responsibility? 4 <b>A. That's correct, yes.</b> 5 Q. Are you able to assist with any particular individual 6 names of those responsible for advancing the measures 7 that you had recommended and which had been approved? 8 <b>A. No, I mean, all of those recommendations go forward, 9 once they have been approved they go through to 10 engineering guys that will come up with detailed 11 engineering plans and how it is going to be done. Then 12 it goes into the projects area and then so on and so 13 forth. And of course given the duration of some of 14 those recommendations there would have been people that 15 started them and left the project, people that picked 16 them up and so on and so forth but ultimately oversight 17 for all that stuff will go up to management.</b> 18 Q. Looking to the CPF, I understood you to be saying that 19 you had recommended a package of upgrade measures in 20 around 2006/2007 including VCP barriers, chicane 21 upgrades and I think you indicated that that also 22 included sliding gates at the CPF, is that right? 23 <b>A. Yes.</b> 24 Q. When asked about the timeline of implementing those 25 measures Mr Fitzpatrick said in his evidence that they</p> <p style="text-align: center;">Page 243</p>
<p>1 <b>A. Yes.</b> 2 Q. Were there any others that you can recall? 3 <b>A. No, I think pretty much everything was JOC took on 4 board.</b> 5 Q. I understand from evidence that Mr Fitzpatrick gave that 6 he had a preference for the guard towers outside the 7 perimeter of the BdV to be manned although the Gendarmes 8 refused. Were you aware that he had that preference? 9 <b>A. Yes, I mean, there were a number of external security 10 preferences that we would have had which was we would 11 have preferred to have a Gendarme road block outside the 12 camp. We would have preferred to have Gendarmes in 13 guard towers.</b> 14 Q. So you shared that preference? 15 <b>A. Yes.</b> 16 Q. And that preference was communicated to the JOC? 17 <b>A. It was discussed but there are things you can control on 18 the project, there are things you can't control and 19 there's things you can try and influence --</b> 20 Q. I appreciate that. 21 <b>A. -- and you cannot control the Gendarmes. So it would be 22 pointless almost having a discussion about something you 23 cannot control and suggesting it should be in place.</b> 24 Q. Certainly in your position you weren't in a position to 25 control that?</p> <p style="text-align: center;">Page 242</p>	<p>1 had to wait until the construction and commissioning was 2 done before they could make any further upgrades 3 including sliding gates. Is he right about that? That 4 you had to wait until some phase of construction had 5 been completed? 6 <b>A. Well, anything, I'm sure you would agree that when you 7 have got a project the size of In Amenas and the gas 8 plant, for what it is, what you don't want is 9 a continual string of construction projects in 10 succession. What you would do is say, okay, well 11 security needs upgrading but concurrently we also need 12 to upgrade, whatever it is, X, Y and Z, so we need to 13 look at this as an integrated project and do it all in 14 one go so we minimise disruption to normal business.</b> 15 Q. Were you made aware of any specific reason why sliding 16 gates in particular could not have been installed at an 17 earlier point? 18 <b>A. No.</b> 19 Q. What about any reason why the security alarm by which 20 I mean the specific intermittent alarm couldn't have 21 been installed? 22 <b>A. I'm not aware of any.</b> 23 Q. That wouldn't be affected by construction projects as 24 such, would it? 25 <b>A. I'm not aware of any but again, I wouldn't</b></p> <p style="text-align: center;">Page 244</p>

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<p>1 necessarily -- but again that's down to our project 2 manager.</p> <p>3 Q. Fine, I will move on then. You have indicated it was 4 not liaison's role to assist the likelihood of a 5 particular threat manifesting. Is that correct?</p> <p>6 A. We were aware of security risks. Of course we were 7 aware of the current threat. But we never provided any 8 JV threat assessment. There is no document in any of 9 these folders titled "JV threat assessment".</p> <p>10 Q. Yes, could we just turn to page 184 of the green bundle. 11 You were referred to this document earlier. It is the 12 JV liaison project risk assessment. So I just want to 13 clarify, there is a probability indicator there for 14 terrorism. Is that something that you would be relying 15 on information you had been provided by BP or is that an 16 assessment which liaison had come up with on its own?</p> <p>17 A. No, this is something that would have been passed down 18 to us from the BP guys. You already heard from Andy, 19 I saw Andy Collins's testimony, they would have 20 a bi-annual security review. We actually had an open 21 invite to that and if operationally we could be there we 22 would. But more often than not we couldn't because we 23 had to be on site for various reasons. It was during 24 those forums that they would discuss what the alert 25 level should be and what these risk numbers should be.</p> <p style="text-align: center;">Page 245</p>	<p>1 can I word it, say practical analysis which would be it 2 doesn't really matter whether it's politically 3 motivated, whether it's criminally motivated or whether 4 it's a civil crisis. The mechanisms by which they're 5 going to affect us are going to be forced entry attack, 6 kidnap and ransom or the civil unrest. So the 7 motivation behind that may change. That could be 8 a civil war. It could be a domestic or a foreign 9 terrorist, but the mechanism of that attack is 10 a security risk which we would focus on.</p> <p>11 Q. And the security risks which you accounted for included 12 a kidnapper, and it included a group attacking the site?</p> <p>13 A. Yes, forced entry.</p> <p>14 Q. Last topic, Mr Wigg, crisis management. I think you 15 indicated that you called the Gendarmes when you were 16 involved in the IMT?</p> <p>17 A. Well, I was with, I got my assistant to call and I stood 18 next to him and told him what to say.</p> <p>19 Q. And that included a call to the Gendarmes based at 20 In Amenas?</p> <p>21 A. Yes.</p> <p>22 Q. But it wasn't you who spoke to them personally?</p> <p>23 A. No.</p> <p>24 Q. Were you with the person who made the phone call at the 25 time?</p> <p style="text-align: center;">Page 247</p>
<p>1 So if you look at this JV liaison project risk 2 assessment and then look at the BP one what you should 3 see is that the risks -- we would have to change it 4 a bit to change the JV one because the BP one is 5 a regional one and this is a project one. So 6 effectively these numbers were not set by liaison.</p> <p>7 Q. Did you ever give any advice as to the probability of 8 a terrorist attack in the form of say a large group of 9 attackers as opposed to a smaller group of attackers or 10 a lone individual?</p> <p>11 A. Again, what we did is dealt with in security risks. 12 Now, the mechanisms, I mean even the attack that befell 13 us on that day if you break it down into its component 14 parts, which effectively was depending which story you 15 want to believe or adhere to, it was an attempted kidnap 16 of a bus, which kidnap or ransom is one of the primary 17 risks, security risks which we addressed. And then it 18 was a forced entry into BdV and the CPF, both -- which 19 again is a security risk.</p> <p>20 Q. So I understand you to be saying that you would identify 21 the different types of attacks which might occur but it 22 wasn't your role to say that one, yes, that's 23 conceivable, that one's very unlikely. That's more 24 likely but that wasn't your role?</p> <p>25 A. What we would do is we would turn that into a more, how</p> <p style="text-align: center;">Page 246</p>	<p>1 A. Yes.</p> <p>2 Q. Did you get a sense of what their awareness was of the 3 attack at the time you called them?</p> <p>4 A. Yes.</p> <p>5 Q. What was that?</p> <p>6 A. They were aware. They were aware something was 7 happening. They're not necessarily going to feed back 8 to us, they would not feed back to us the details of 9 what they heard. They just said: yes, we're aware of 10 a problem there, it's in hand.</p> <p>11 Q. And they wouldn't feed back to you what their stated 12 reaction was, if I could put it that way?</p> <p>13 A. No, they would never do that.</p> <p>14 Q. I would just like to read you briefly a passage from 15 Mr Gary Butt's statement at page 8. He writes: 16 "In terms of our security policies the correct 17 response to the attack should have been that the gates 18 would be locked down. The radio operator would then be 19 contacted to let them know there was an alert. The 20 radio operator would then pass that message on to the 21 military Gendarmes. There would be a company alert over 22 the radio to instruct all staff using a colour coded 23 warning which conveys a set instruction. Some but not 24 all staff have radios. The code would tell them whether 25 to come back to site or stay put."</p> <p style="text-align: center;">Page 248</p>

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<p>1 Does that procedure sound familiar to you?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. Shifting that across to the context of mobile</p> <p>4 telephones. I asked this question of Mr Fitzpatrick.</p> <p>5 Are you aware of whether or not the JOC or the JV issued</p> <p>6 mobile phones to its workers?</p> <p>7 <b>A. Only in the course of a needs basis, not on a security</b></p> <p>8 <b>basis.</b></p> <p>9 Q. On page 6 of your statement you write this:</p> <p>10 "IMT1 had set a standard message to be sent to</p> <p>11 people on site and set up to catch information coming</p> <p>12 from the site into the room. The standard message was</p> <p>13 to hide and stay hidden and stay where you are. Not to</p> <p>14 trust anyone including your own national staff. If</p> <p>15 anyone tells you it's all clear et cetera then ignore</p> <p>16 them."</p> <p>17 Was that message conveyed by text as well as by</p> <p>18 radio?</p> <p>19 <b>A. It wasn't -- that came from Hassi Messaoud to In Amenas.</b></p> <p>20 <b>So it wasn't conveyed by radio, because there is no</b></p> <p>21 <b>radio contact between Hassi Messaoud and In Amenas.</b></p> <p>22 Q. Fine. So was that a message you were conveying to those</p> <p>23 people who contacted the IMT?</p> <p>24 <b>A. Not just the IMT. As I explained to Ms Dolan what we</b></p> <p>25 <b>did was anybody, we put out a message to all our staff,</b></p> <p style="text-align: center;">Page 249</p>	<p>1 <b>A. Yes, that list would have been work phones. So there</b></p> <p>2 <b>would have been certain functions on site who needed</b></p> <p>3 <b>a mobile phone. So the general manager would have had</b></p> <p>4 <b>one, the projects manager would have had one but not</b></p> <p>5 <b>every engineer on site would necessarily have one.</b></p> <p>6 Q. So you had incomplete lists, is that what you are</p> <p>7 saying?</p> <p>8 THE CORONER: No, I think you are saying not everybody would</p> <p>9 have had a phone.</p> <p>10 <b>A. Exactly, yes.</b></p> <p>11 THE CORONER: I think you say you have a list of the phones</p> <p>12 they had but not everybody would have had one.</p> <p>13 MR FLINN: I understand. Incomplete in the sense that not</p> <p>14 all workers on site would have a number listed on the</p> <p>15 document?</p> <p>16 <b>A. I think that's correct. We had next of kin forms and so</b></p> <p>17 <b>and so forth and project personnel files which had</b></p> <p>18 <b>contact numbers and things on them, yes, but did we have</b></p> <p>19 <b>a dedicated list in the event of a security incident?</b></p> <p>20 <b>No.</b></p> <p>21 MR FLINN: Thank you very much. I have no further</p> <p>22 questions.</p> <p>23 THE CORONER: Thank you. What I am going to do is take</p> <p>24 a ten-minute break because we have been going a long</p> <p>25 time and then you can ask your questions of the witness.</p> <p style="text-align: center;">Page 251</p>
<p>1 <b>anybody receiving contact from people at site give us</b></p> <p>2 <b>their mobile phone numbers and then we'd send these</b></p> <p>3 <b>advice back.</b></p> <p>4 Q. Obviously, I am sure you would agree, that communication</p> <p>5 of that information is very important so that those</p> <p>6 people who are in hiding know that they should stay in</p> <p>7 hiding until the situation is resolved?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. I think you indicated to Ms Dolan that in terms of</p> <p>10 making contact with people it was essentially pot luck</p> <p>11 in the sense that you had access to certain numbers.</p> <p>12 You put out a message to others saying if someone</p> <p>13 contacts you please pass on this message. Is that the</p> <p>14 extent of what you were able to do?</p> <p>15 <b>A. No, we didn't say "please pass on this message." What</b></p> <p>16 <b>we did was, as I explained we had like our little cell</b></p> <p>17 <b>and they did it. We didn't tell random individuals to</b></p> <p>18 <b>tell their friends at site to do X, Y and Z. What we</b></p> <p>19 <b>did was got their numbers and did it centrally and then</b></p> <p>20 <b>they could record who had been sent what and so on and</b></p> <p>21 <b>so forth.</b></p> <p>22 Q. Mr Fitzpatrick indicated in his evidence that there was</p> <p>23 a centralised list of mobile numbers that were kept</p> <p>24 updated monthly. You didn't have access to that</p> <p>25 centralised list?</p> <p style="text-align: center;">Page 250</p>	<p>1 What I think we'll need to do in that break is anybody</p> <p>2 who has got questions that they want asked of</p> <p>3 Mr Lord I think is going to have to communicate the</p> <p>4 topics to Ms Dolan in the break because it may be that</p> <p>5 we will only have time for her to ask questions of</p> <p>6 Mr Lord and she will have to take in other topics.</p> <p>7 We'll see how we go but I just want to cover ourselves</p> <p>8 that way.</p> <p>9 MR POPAT: May I just suggest in light of the time and the</p> <p>10 indication you gave earlier on and I am raising this</p> <p>11 just as a possibility that Mr Lord's statement may be</p> <p>12 one that could be read in due course. I am not quite</p> <p>13 sure in the light of Ms Dolan's time estimate how much</p> <p>14 in addition to his written statement there is to ask</p> <p>15 him.</p> <p>16 THE CORONER: No, I have to say, that is why I am suggesting</p> <p>17 what -- we can think about that as well because it may</p> <p>18 be there isn't an awful lot that needs to be covered</p> <p>19 with him but let's have a ten-minute break.</p> <p>20 MR OWEN-THOMAS: Sir, sorry, before you do you break I cut</p> <p>21 my cloth on the basis that we have Mr Butt coming later</p> <p>22 on. It just occurred to me I should have asked if there</p> <p>23 is any reason why Mr Butt would be in a worse position</p> <p>24 than this witness to answer those questions. I wonder</p> <p>25 if I can just do that now and then I can forget that.</p> <p style="text-align: center;">Page 252</p>

1 Mr Wigg, Mr Butt is coming along later on. He was  
 2 your back-to-back. I assume he has the same level of  
 3 knowledge and can answer the same sort of questions as  
 4 you can?  
 5 **A. Absolutely.**  
 6 **MR OWEN-THOMAS: No reason why he can't?**  
 7 **A. No.**  
 8 THE CORONER: All right. Ten minutes.  
 9 (4.58 pm)  
 10 (A short break)  
 11 (5.10 pm)  
 12 Questions from MR POPAT  
 13 MR POPAT: Mr Wigg, I ask some questions on behalf of BP.  
 14 You are aware that our time is fairly limited.  
 15 **A. Yes.**  
 16 Q. And you heard the instruction from the coroner to the  
 17 advocates that we should ask you direct questions rather  
 18 than building up to it?  
 19 **A. Yes.**  
 20 Q. So may I just ask you directly: it is plain nonsense for  
 21 you to suggest that the liaison team weren't responsible  
 22 for assessing the threats to the In Amenas project?  
 23 **A. Okay.**  
 24 Q. That is a question.  
 25 **A. Oh it is a question? Okay. Okay, so it wasn't**  
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1 **nonsense. That's exactly what we did and there were**  
 2 **a number of reasons for it. Firstly, we didn't have any**  
 3 **resources. So nobody on the liaison team from the JV**  
 4 **had any contacts with FCO, government connections,**  
 5 **police, anybody else. We also didn't have the resources**  
 6 **to collate the information that you would need to do, to**  
 7 **form a threat assessment. So the BP guys in Algiers**  
 8 **would collate that information from open sources, from**  
 9 **FCOs, and feed that back to us. Would you like an**  
 10 **example or?**  
 11 Q. No, we have got lots of summaries so we can look at  
 12 those if we need to.  
 13 Mr Lord in his witness statement says that the OLM,  
 14 which I think is you?  
 15 **A. Yes.**  
 16 Q. Would consolidate reports from multiple sites in  
 17 a region in order to have an overview of the security  
 18 issues concerning the region. Is that not right?  
 19 **A. We'd give an overview, as you have read, in the security**  
 20 **management plan but that's a preamble, if you like, an**  
 21 **introduction to why the following measures and the SMP**  
 22 **are there.**  
 23 Q. Mr Wigg, consolidate reports from multiple sites in a  
 24 region in order to have an overview of the security  
 25 issues. Did you do that?  
 Page 254

1 **A. We formed -- well you have read the security management**  
 2 **plan so you have read that overview and that's what we**  
 3 **did.**  
 4 Q. Let us look at the security management plan. Tab 11 in  
 5 the core bundle. You said at one stage: look at the  
 6 documents, there's nothing there which amounts to an  
 7 assessment of threat?  
 8 **A. That's correct, yes.**  
 9 Q. The security management plan produced in December 2012  
 10 begins at page 90. The document, if you turn over to  
 11 page 92, in the large box at the top of the page it is  
 12 identified as having been updated by In Amenas and  
 13 Hassi Messaoud liaison, that is you --  
 14 **A. Yes.**  
 15 Q. -- and Mr Fitzpatrick?  
 16 **A. That's correct, yes.**  
 17 Q. And his back-to-back. Bottom of page 92, heading up  
 18 from the bottom, below the bottom holepunch "Threat".  
 19 **A. Yes.**  
 20 Q. "Overview."  
 21 **A. Yes.**  
 22 Q. And then what follows is an overview of the threat?  
 23 **A. Yes.**  
 24 Q. And it carries on over the page and albeit in summary  
 25 form, this being a security management plan, summarises  
 Page 255

1 the threat?  
 2 **A. What it does is describes the threat and more**  
 3 **importantly, explains the security risks that come from**  
 4 **that threat.**  
 5 Q. Of course.  
 6 **A. So what this is doing is describing and giving some**  
 7 **context if you like to the security threats that we have**  
 8 **to counter.**  
 9 Q. Civil crisis plan.  
 10 **A. Yes.**  
 11 Q. Core bundle, divider 13.  
 12 **A. Yes.**  
 13 Q. See behind the first page behind divider 13, you are one  
 14 of the authors?  
 15 **A. That's correct, yes.**  
 16 Q. And you have already acknowledged that. Turn over, we  
 17 will just look at one page.  
 18 **A. Mmm.**  
 19 Q. Page 146.  
 20 **A. Yes.**  
 21 Q. Bottom of the page alert levels:  
 22 "Alert states provide a formal process to assess the  
 23 security risk and to raise the protection to meet an  
 24 increasing threat."  
 25 **A. Agreed, yes.**  
 Page 256



1 Q. So the purpose of the civil crisis plan and the setting  
 2 of the alert levels is to assess the security risk and  
 3 to raise protection in order to meet an increase in  
 4 threat?  
 5 **A. Yes, and this is lifted directly from the BP security**  
 6 **civil crisis plan and put into here because we -- the BP**  
 7 **civil crisis plan will, I am under no illusion, always**  
 8 **take primacy over the JV one. So in effect, and I know**  
 9 **this will be supported by business support manager, the**  
 10 **arrangement was very much one of a holistic approach to**  
 11 **civil crisis because civil crisis is not going to affect**  
 12 **In Amenas or ISG. It will affect the country and all**  
 13 **operations within it. So decisions about what should**  
 14 **happen or what shouldn't happen to BP, Statoil and**  
 15 **Sonatrach staff in a civil crisis situation will always**  
 16 **be taken by their parent companies.**  
 17 Q. Mr Wigg, the civil crisis plan is a JV civil crisis  
 18 plan?  
 19 **A. Only after it was the BP one until Statoil came and then**  
 20 **we rebranded it.**  
 21 Q. This one, the one we have just been looking at, was in  
 22 place before the attack took place?  
 23 **A. Yes, it was.**  
 24 Q. It is a JV civil crisis plan and in it just above the  
 25 section we have looked at, one of the things, bottom  
 Page 257

1 right, in that alert levels box that was being looked  
 2 at, the threats of violence including terrorist actions,  
 3 threats of kidnapping or assassination?  
 4 **A. Sorry, where are we looking here?**  
 5 Q. That section we had. The alert level section?  
 6 THE CORONER: 146 and then under the last green line,  
 7 "Threat of violence" is the sort of cross heading.  
 8 MR POPAT: It is not very well copied so I don't know  
 9 whether you can see "Threat of violence" but you see  
 10 where it says "Alert levels" at the bottom?  
 11 **A. Yes.**  
 12 Q. Above that?  
 13 **A. Yes.**  
 14 Q. That section that's there, go to the right-hand side?  
 15 **A. So we are talking about the matrix.**  
 16 Q. Yes?  
 17 **A. Terrorist actions, threats of kidnapping, assassination.**  
 18 Q. So that was something that was being assessed in order  
 19 to determine the appropriate alert levels for the JV?  
 20 **A. Yes, but it wasn't being assessed by the JV. There was**  
 21 **no forum, there was no management meeting within which**  
 22 **we would determine those threat assessments.**  
 23 Q. The services that AFMC were to provide to the JV were  
 24 services provided pursuant to a contract?  
 25 **A. Yes.**  
 Page 258

1 Q. And a contract which, and I won't divulge the details of  
 2 the amounts being paid, we have the contract in the  
 3 bundles, but presumably that is commercially sensitive  
 4 information but it was a substantial sum of money, is  
 5 that right, are you aware of that?  
 6 **A. I've never seen the contract. I've no idea of what --**  
 7 Q. Let us look at just another document. One you have  
 8 produced behind divider 8.  
 9 **A. Yes.**  
 10 Q. Here is an email from you to a number of people within  
 11 the JV and in it you identify an event that has  
 12 occurred, the French intervention in Mali, and what you  
 13 set out in the following paragraph is I suggest exactly  
 14 an assessment of threat:  
 15 "It is unlikely [you write] that events in Mali will  
 16 have direct security implications on the projects. Both  
 17 projects are along way from the Mali border. However we  
 18 can expect to see military impose closer control."  
 19 And you go on to set out what is there.  
 20 You are always carrying out assessments of threats,  
 21 aren't you?  
 22 **A. No, no. What we do is we look at the security risks**  
 23 **that come from those threats. That's -- that strategic**  
 24 **level of threat assessment would always come from BP.**  
 25 **A prime example would be the fax that has been referred**  
 Page 259

1 **to in many times in this courtroom about the increased**  
 2 **threat of VBIED. It came via a fax for Hassi R'Mel and**  
 3 **there were other instances where that came from as well.**  
 4 **In that instance for example we came by that information**  
 5 **so we forward that to BP. We forward that to Statoil.**  
 6 **We forward it to our own management and they came back**  
 7 **to us. In that instance BP came back to us, Statoil**  
 8 **never responded. BP came back to us and said**  
 9 **specifically: okay, we see this as a security risk of**  
 10 **VBIED but for the current threat level for Algeria and**  
 11 **the projects BP do not see this as a change in threat**  
 12 **level and that is the oversight and lead which BP gave**  
 13 **us, which was great and that's how we operated. They**  
 14 **gave us oversight and lead and we implemented the**  
 15 **measures to the security risk.**  
 16 Q. Mr Wigg, you are the liaison team. You were sitting in  
 17 Hassi Messaoud. Are you really suggesting that all you  
 18 did was receive documents from BP, looked at them and  
 19 then passed them on to others?  
 20 **A. No, what I did was I gave advice to a project. I had to**  
 21 **manage a team. I had to cost control a \$30 million**  
 22 **budget every year.**  
 23 Q. So as far as security advice is concerned and the  
 24 assessment of threats all you did, is that what you are  
 25 saying, is pass on whatever was handed over to you by  
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1 BP?

2 **A. What we did was look at security risks that were**

3 **established pursuant to the threats that had been**

4 **identified by BP and we looked at those security risks**

5 **and we made suggestions of how we could mitigate those**

6 **risks and then looked to implementing them and using the**

7 **SMP as the tool to track and feed back because it is**

8 **a circular process. If you look at any security**

9 **management process there's always a top tier of top**

10 **management that will look at threat assessment,**

11 **vulnerability assessment and from that will establish**

12 **a set of security risks that are -- that come from that**

13 **threat and our vulnerability and those risks are then**

14 **passed down to the project to be considered and**

15 **implemented -- you know, mitigation level, mitigation**

16 **measures, to counter them.**

17 Q. Mr Wigg, BP had no obligation to provide you with any

18 sort of assessment at any stage, did it?

19 **A. Obligation?**

20 Q. Yes.

21 **A. That's way above my level to know what their obligations**

22 **are.**

23 Q. If BP hadn't provided you with weekly summaries there is

24 nothing you could do about that, you wouldn't complain

25 about that and say "hold on, you're not providing me

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1 with a weekly summary, I can't do my job."

2 **A. If BP had cut away and said "we're no longer going to**

3 **support you with the civil crisis plan, we're no longer**

4 **going to give you a weekly security thing, we're no**

5 **longer going to send you our updated risk assessment**

6 **twice a year and our updated security management plan**

7 **each year", I would have gone to my line manager, the**

8 **business support manager, and I would have said "okay,**

9 **what do I do now?"**

10 Q. So you produced a weekly, whatever the correct term is,

11 but a weekly update assessment document from

12 Hassi Messaoud?

13 **A. No. We did a weekly update with the business support**

14 **manager which is an update on operations. So that would**

15 **be, okay, I've got to cost control the a \$30 million**

16 **budget with 650 staff. I have got problems with this.**

17 **This needs resolving. I have got this, this needs**

18 **resolving.**

19 Q. I really want to try and do this as quickly as possible,

20 Mr Wigg. It is not your fault. You are here to try and

21 help so just help me, would you? We will do it as

22 quickly as we can.

23 **A. Yes, point me at it.**

24 Q. There should be a file in front of you which contains

25 Mr Johnston's exhibits.

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1 **A. Give me a clue.**

2 Q. I can't tell you which it is. You have a number of

3 files in front of you. It may be the one just at the

4 bottom underneath.

5 **A. Okay, do you have a page for me?**

6 Q. If you just open up the document there is a copy of one

7 of these documents. Do you have the --

8 **A. Okay, a witness statement.**

9 Q. Mr Johnston's statement at the front. Go behind

10 Mr Johnston's statement. Is there a tab which divides

11 the tab from the exhibits?

12 **A. I don't have any tabs. You are going to have to help me**

13 **out. It has page numbers.**

14 Q. You need to go beyond the witness statement, Mr Wigg,

15 and then you will find the first of these HMD liaison

16 updates?

17 **A. Okay, yes, I think I have got it. Has it got this big**

18 **redacted --**

19 Q. Do you have a number at the bottom right?

20 **A. Yes, number 1.**

21 Q. This is a redacted document.

22 **A. Yes.**

23 Q. These are the HMD liaison updates which were produced on

24 a weekly basis, is that right?

25 **A. Yes.**

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1 Q. Produced by your department?

2 **A. Me and my back to back.**

3 Q. Mr Butt?

4 **A. Yes.**

5 Q. And in it you summarise incidents which have occurred.

6 So this one just has one incident at the top of the

7 page, newspaper reports, stated various arms of security

8 forces have increased their presence and so on.

9 **A. Yes.**

10 Q. Now, I really can take you to a very large number of

11 these. We did look at them with Mr Fitzpatrick, again

12 in summary form. But don't you agree that they contain

13 in them on a weekly basis reports or assessments of

14 incidents that have occurred?

15 **A. What that is, is --**

16 Q. First, is that right?

17 **A. Well, just say that again because the words are quite**

18 **important here.**

19 Q. They contain reports and assessments of incidents that

20 have occurred?

21 **A. No, there is no assessment in there. If you look at the**

22 **page that you have drawn me to that is -- all that says**

23 **is "newspaper report stated that various arms of**

24 **security forces have increased their presence by around**

25 **7,000 troops on hydrocarbon installations in the**

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<p>1 <b>southern region following the recent attacks against</b>  2 <b>Gendarmerie bases in Tamanrassat and more recently</b>  3 <b>Ourgla." That is it.</b>  4 Q. That is what that page says and we will -- perhaps the  5 easiest way of dealing with this is to look at this in  6 more detail with Mr Butt but let me just give you one  7 example. Page 88.  8 <b>A. Yes.</b>  9 Q. At the top?  10 <b>A. Yes, I have got.</b>  11 Q. An incident, we don't need to read it through. We can  12 all see it. It is there. There is an incident which is  13 reported and then over the page reference specifically  14 to In Amenas and the last bullet point, the second  15 bullet, IIMT incident, 25 August 2012:  16 "Should the HMD IMT mobilise for routine exercise in  17 the field or roleplay the scenario? The issue may be  18 raised in the future."  19 So just a point that somebody is raising, you or  20 Mr Butt, in the course of this weekly update and --  21 <b>A. But that's not related to the incident from the page</b>  22 <b>before.</b>  23 Q. No.  24 <b>A. Oh, sorry.</b>  25 Q. Let me just put it in short form in this way. There  Page 265</p>	<p>1 security incidents?  2 <b>A. Security incidents, yes, got it, yes.</b>  3 Q. North and south, and over the page a number of things  4 which are specific to In Amenas?  5 <b>A. Right. So to give you some insight into that, the</b>  6 <b>second page, which has got military protection zone</b>  7 <b>timings, CPF, BdV zone and gathering system, that detail</b>  8 <b>is on there every week and the purpose of it being there</b>  9 <b>every week is to inform staff on site if there's any</b>  10 <b>changes. So, for example, military protection zone</b>  11 <b>timings it says a gathering system curfew is from 6.30</b>  12 <b>in the morning until 5.30 in the afternoon. Now that</b>  13 <b>may change because daylight hours change and if it is</b>  14 <b>changed it is during that meeting forum that the OLS</b>  15 <b>would detail that the military had changed that curfew.</b>  16 Q. There are site specific things which are recorded in the  17 liaison updates produced at In Amenas.  18 <b>A. Yes.</b>  19 Q. You said it would all be just cut and pasted from the BP  20 weekly summary which is actually just provided for  21 Algeria generally?  22 <b>A. Not at all.</b>  23 Q. It is produced by the BP Algiers office?  24 <b>A. Agreed.</b>  25 Q. Of course it has things which are specific to the south  Page 267</p>
<p>1 are, and we can read these to ourselves, but there are  2 weekly HMD liaison updates which are produced by you?  3 <b>A. Yes.</b>  4 Q. They contain in them, at least you would agree this,  5 wouldn't you, reports of incidents that have occurred  6 which presumably you regarded as of potential relevance  7 to security at In Amenas?  8 <b>A. Not necessarily In Amenas but throughout the country.</b>  9 <b>What we would do. Let me cut to the chase for you.</b>  10 <b>What we would do is anything that would come our way</b>  11 <b>through the internet or picked up in the papers or</b>  12 <b>somebody had sent to us, we thought that might be</b>  13 <b>something my line manager would like to know and we'd</b>  14 <b>pass it on.</b>  15 Q. Exactly. That's what you did. At the same time as you  16 were doing that the In Amenas liaison department were  17 producing their own weekly updates?  18 <b>A. Yes, but the In Amenas ones were pretty much, if you</b>  19 <b>compare them, take a date, any one you like and then</b>  20 <b>take weekly security report from Algiers, the BP one, it</b>  21 <b>is cut and pasted.</b>  22 Q. Let us just identify what they are. Page 123, these are  23 weekly meeting and procedure updates.  24 <b>A. Yes.</b>  25 Q. They contain, as we can see at page 123, reports of  Page 266</p>	<p>1 of Algeria. But it also has things that are particular  2 to the north of Algeria?  3 <b>A. Yes.</b>  4 Q. I think you said well it's always just a cut and paste?  5 <b>A. No, I didn't, no, no.</b>  6 Q. Sorry, I thought that is what you said?  7 <b>A. Some of it is cut and pasted and some of it, as you</b>  8 <b>rightly said, is local detail. So curfew times --</b>  9 Q. Are you saying the security incident reports are all cut  10 and pasted, are they?  11 <b>A. The weekly security report and documents provided to us</b>  12 <b>by BP form the basis of our documents which are then</b>  13 <b>communicated further. It would be unrealistic to expect</b>  14 <b>the liaison manager in Algiers to forward the</b>  15 <b>information he had and distribute that throughout the JV</b>  16 <b>to all the necessary places it needs to land.</b>  17 Q. Then why don't you just look, please, at page 133 in the  18 exhibits to Mr Johnston's statement?  19 <b>A. Yes.</b>  20 Q. Just by way of one example. 18 February In Amenas  21 liaison department, this is a document in the same sort  22 of form that we have seen already?  23 <b>A. Yes. Agreed, yes.</b>  24 Q. And if you turn over to 135 it contains some details of  25 some security incidents reported since the last period?  Page 268</p>

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<p>1 <b>A. Yes, that's right.</b></p> <p>2 Q. Just because we have it easily in the core bundle</p> <p>3 I think, if you turn, please, to the core bundle,</p> <p>4 keeping that document open, green file, tab 24, it may</p> <p>5 be I have just missed this, but you see there a document</p> <p>6 which is part of the BP weekly summary?</p> <p>7 <b>A. Yes, south, it starts with south.</b></p> <p>8 Q. Yes, exactly. For everyone else's information this is</p> <p>9 taken from Mr Johnston's exhibits in another file. To</p> <p>10 save us looking at it I am just going to look at it in</p> <p>11 this document. This is for the week ending</p> <p>12 19 February 2012, the BP summary?</p> <p>13 <b>A. Sorry, the week ending?</b></p> <p>14 Q. The BP summary is for the week ending 19 February 2012,</p> <p>15 right?</p> <p>16 <b>A. Okay.</b></p> <p>17 Q. Do you see the middle of the page, the first holepunch,</p> <p>18 a report from BP in the Algiers office about Algeria</p> <p>19 seizing missiles smuggled from a Libyan source. Then it</p> <p>20 goes on and sets out in some detail what has been</p> <p>21 identified there.</p> <p>22 <b>A. Mmm.</b></p> <p>23 Q. And concludes by saying in the third paragraph from the</p> <p>24 bottom:</p> <p>25 "No official confirmation of the discovery from the</p> <p style="text-align: center;">Page 269</p>	<p>1 there?</p> <p>2 MR POPAT: No.</p> <p>3 <b>A. Okay, so ...</b></p> <p>4 Q. It is not a cut and paste. Somebody has obviously</p> <p>5 carried out some sort of assessment of things that they</p> <p>6 think are important and they're contained in the</p> <p>7 In Amenas liaison department updates. In addition, you</p> <p>8 produced internal monthly updates?</p> <p>9 <b>A. No.</b></p> <p>10 Q. We looked at this with Mr Fitzpatrick.</p> <p>11 <b>A. Sorry?</b></p> <p>12 Q. There is a monthly update produced by the liaison team?</p> <p>13 <b>A. The monthly situation procedures document had a very</b></p> <p>14 <b>specific role and what that does is that gives us in</b></p> <p>15 <b>Hassi Messaoud and project management at site the rule</b></p> <p>16 <b>book, if you like, for what the procedures are for that</b></p> <p>17 <b>month. So curfews may have changed, the number of</b></p> <p>18 <b>escort vehicles changed on a regular basis, so that</b></p> <p>19 <b>document would be updated by Paul and Fitz and it would</b></p> <p>20 <b>lay out, if you like, the rule book for moving around</b></p> <p>21 <b>the field for where you had to be and where you didn't</b></p> <p>22 <b>have to be at certain times of day. It wouldn't be</b></p> <p>23 <b>a generally open document. It was a control document</b></p> <p>24 <b>because it effectively told the world how we operated.</b></p> <p>25 <b>So it was something that went to us, so as a liaison</b></p> <p style="text-align: center;">Page 271</p>
<p>1 Algerian government."</p> <p>2 That is week ending 19 February. This In Amenas</p> <p>3 document that I have just taken you to in page 135 in</p> <p>4 Mr Johnston's exhibits is 18 February, it doesn't appear</p> <p>5 to refer to that incident or that report as identified</p> <p>6 by BP, does it?</p> <p>7 <b>A. That would be for one of two reasons I suspect. One, we</b></p> <p>8 <b>don't necessarily get the WSR on the day that it is</b></p> <p>9 <b>finished and secondly, the article to which you refer is</b></p> <p>10 <b>actually a cut and pasted Reuters report. So it's not</b></p> <p>11 <b>something that Fitz or Paul would copy verbatim into</b></p> <p>12 <b>a weekly report that's supposed to be a bullet point</b></p> <p>13 <b>meeting update. It is not -- the weekly updates that</b></p> <p>14 <b>Fitz and Paul gave just give an insight into what has</b></p> <p>15 <b>happened in the last week. They are not detailed</b></p> <p>16 <b>security reports. They were never intended to be.</b></p> <p>17 Q. No, just so that it deals with the point you have just</p> <p>18 made. Of course that may not have even been received by</p> <p>19 the time the 18 February In Amenas liaison update was</p> <p>20 prepared?</p> <p>21 <b>A. Okay.</b></p> <p>22 Q. If you want to see the 25 February one, which is the</p> <p>23 week after, produced by the liaison department it is at</p> <p>24 page 138.</p> <p>25 THE CORONER: I don't think there is reference there, is</p> <p style="text-align: center;">Page 270</p>	<p>1 <b>manager I knew what the current day-to-day regime was on</b></p> <p>2 <b>site and for Mark and Lotfi or whoever it was their</b></p> <p>3 <b>insight into okay, things have changed so we have gone</b></p> <p>4 <b>from 13-hours of operations to 12 because the curfew has</b></p> <p>5 <b>changed.</b></p> <p>6 Q. Mr Wigg, I am just going to deal with the questions that</p> <p>7 I want to raise with you. Let's move on. Can I just</p> <p>8 suggest to you that all you are seeking to do in fact is</p> <p>9 to downplay the role and function of the liaison team</p> <p>10 and its importance in assessing the security threats</p> <p>11 that were posed to people at In Amenas?</p> <p>12 <b>A. Okay, so in response to that I think I'd say two things</b></p> <p>13 <b>firstly. If we look at my job description and indeed</b></p> <p>14 <b>the function of liaison within the JV that will give you</b></p> <p>15 <b>a clear indication of what my role was and that's</b></p> <p>16 <b>indisputable.</b></p> <p>17 Q. And that included, as Mr Lord summarised it, the</p> <p>18 consolidation of reports from multiple sites in the</p> <p>19 region in order to have an overview of the security</p> <p>20 issues concerning the region?</p> <p>21 <b>A. That is not my JV job description. Is my job</b></p> <p>22 <b>description --</b></p> <p>23 Q. It is in one of the bundles. I am not going to take you</p> <p>24 to it just to save time but that was what I put to you</p> <p>25 as a summary being put forward by Mr Lord and I thought</p> <p style="text-align: center;">Page 272</p>

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<p>1 you agreed but if you don't --</p> <p>2 <b>A. I've never heard that before. I presume that is</b></p> <p>3 <b>a contractual document between AFMC and the project and</b></p> <p>4 <b>I was never privy to the commercial contract between the</b></p> <p>5 <b>JV and AFMC.</b></p> <p>6 Q. Can we just move on to the physical security measures</p> <p>7 that were recommended and what the final position was of</p> <p>8 the liaison team in relation to these things?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. Lots of talk about whether things were adequate or</p> <p>11 acceptable or appropriate and the like. Let me just see</p> <p>12 exactly what the liaison team, and you do accept that it</p> <p>13 was for the liaison team to advise on physical security</p> <p>14 measures and that's what you did?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. What they said about the physical security measures, the</p> <p>17 adequacy of them, over these months preceding the</p> <p>18 attack. Quarterly review for June 2012, divider 4 in</p> <p>19 the core bundle.</p> <p>20 <b>A. One moment. This is the one from June?</b></p> <p>21 Q. Yes, I am going to take you to one short passage so we</p> <p>22 can get the final position as set out in these</p> <p>23 documents.</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. The last paragraph on page 18:</p> <p style="text-align: center;">Page 273</p>	<p>1 <b>because there was a heavy reliance on manpower, the SSI,</b></p> <p>2 <b>which we have been through and explained the</b></p> <p>3 <b>shortcomings.</b></p> <p>4 Q. This was December 2012?</p> <p>5 <b>A. Absolutely, yes.</b></p> <p>6 Q. So that was your assessment. Let us look finally at the</p> <p>7 security management plan behind divider 11. Because</p> <p>8 this is also December 2012?</p> <p>9 <b>A. Yes. This is the -- they get sent out together so the</b></p> <p>10 <b>two are linked if you like.</b></p> <p>11 Q. Yes. These set out a range of different things in</p> <p>12 relation to security and explain that physical security</p> <p>13 needs to be in place. Just at the bottom of page 95</p> <p>14 under the heading "Physical security"?</p> <p>15 <b>A. Internal -- hold it.</b></p> <p>16 Q. Right at the bottom:</p> <p>17 "Although all sites will differ slightly, the basic</p> <p>18 physical security measures will be uniform on all</p> <p>19 locations. The chosen combination of physical security</p> <p>20 measures are designed to serve a common purpose. Stop</p> <p>21 and slow down entry of personnel."</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. And over the page it sets out what must be there?</p> <p>24 <b>A. Yes, yes.</b></p> <p>25 Q. Fences, which have to be double fences with razor wire</p> <p style="text-align: center;">Page 275</p>
<p>1 "Current physical security measures in place are</p> <p>2 sufficient but require some of the outstanding items to</p> <p>3 be assessed and addressed."</p> <p>4 Yes?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. That was the summary as provided by the liaison team</p> <p>7 in June 2012?</p> <p>8 <b>A. Yes, I have given some detail about that earlier, yes.</b></p> <p>9 Q. Turn over a tab.</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. You have used different words but this is a security</p> <p>12 review that you produced?</p> <p>13 <b>A. That's it. I wrote this, yes.</b></p> <p>14 Q. Quarter 4. Turn over to page 20. Physical site</p> <p>15 security?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. This is what you said in December 2012:</p> <p>18 "The level of physical security at IA sites is of an</p> <p>19 acceptable standard and the majority of outstanding</p> <p>20 items are being addressed."</p> <p>21 "Is of an acceptable standard"?</p> <p>22 <b>A. That's correct.</b></p> <p>23 Q. And that was your view?</p> <p>24 <b>A. Yes, and I have given detail on that earlier. The</b></p> <p>25 <b>reason why it says "acceptable" rather than "is good" is</b></p> <p style="text-align: center;">Page 274</p>	<p>1 and so on. Gates, strict minimum and with a protection</p> <p>2 equal to the perimeter fence?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. No more than that. Barriers?</p> <p>5 <b>A. The perimeter fence, might I put it, has got</b></p> <p>6 <b>anti-vehicle 3-tonne concrete bars in front of it. So</b></p> <p>7 <b>a gate or an entrance that's equal to a 3-tonne concrete</b></p> <p>8 <b>barrier with a double fence behind it.</b></p> <p>9 Q. Mr Wigg, again, that is just nonsense, isn't it? What</p> <p>10 you have referred to there is the perimeter fence.</p> <p>11 Crash barriers are the last entry in the section.</p> <p>12 <b>A. Okay. Well as pointed out earlier if you want to take</b></p> <p>13 <b>one of these measures in isolation you can't measure it</b></p> <p>14 <b>against something else.</b></p> <p>15 Q. Let me just put it shortly. You have set out a number</p> <p>16 of things that you think really must be done and ensured</p> <p>17 and at no stage, and this may be the position you hold</p> <p>18 even now, but at no stage did you suggest that certain</p> <p>19 physical security measures must be implemented in order</p> <p>20 to provide an acceptable standard of security?</p> <p>21 <b>A. We -- this document, as I said earlier, is for JOC</b></p> <p>22 <b>approved decisions and JOC approved upgrades.</b></p> <p>23 <b>Recommendations that weren't JOC approved were made</b></p> <p>24 <b>symptomatically to security threats that appeared along</b></p> <p>25 <b>the way and they were brought up, put forward and if</b></p> <p style="text-align: center;">Page 276</p>

<p>1 <b>they were rejected you don't see them in here.</b></p> <p>2 Q. Just so far as the gate is concerned, we can see the</p> <p>3 entrance, I think Ms Dolan was trying to find the</p> <p>4 reference to gates in the tracking tables and it may be</p> <p>5 it's to be found at page 100 in that same document, do</p> <p>6 you have page 100?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. This relates to the BdV which we can see on the previous</p> <p>9 page and in fact, the only reference I think to the gate</p> <p>10 is four columns down, entry, exit points. If you go</p> <p>11 over to the third column along it says "Install</p> <p>12 motorized vehicle sliding gates on all main entrances."</p> <p>13 Not "it's essential to install some sort of</p> <p>14 fortified super secure extra protective gate at the</p> <p>15 entrance point"?</p> <p>16 <b>A. No, because this matrix is a summary of actions.</b></p> <p>17 Q. Yes.</p> <p>18 <b>A. The detailed engineering and operational requirement of</b></p> <p>19 <b>each of these components in this matrix are outside of</b></p> <p>20 <b>that. They're subject to engineering design according</b></p> <p>21 <b>to the operational requirement of a security, the heavy</b></p> <p>22 <b>duty security motorized sliding gate.</b></p> <p>23 Q. I just go on in the document. It is page 17 of the</p> <p>24 internal pagination. This is a tracking table in</p> <p>25 relation to recommendations at the IBO and IBO lay down</p> <p style="text-align: center;">Page 277</p>	<p>1 <b>I think it is MOC201 which is one of the construction</b></p> <p>2 <b>internal construction documents for In Amenas, that will</b></p> <p>3 <b>actually detail the whole plan for the CPF and IBO which</b></p> <p>4 <b>included moving all the vehicles out, having a locked</b></p> <p>5 <b>gate policy, heavy duty security sliding gates, a proper</b></p> <p>6 <b>chicane put in place and so on.</b></p> <p>7 Q. It was a simple question I asked. There wasn't</p> <p>8 a motorized sliding gate in place at the IBO lay down</p> <p>9 yard at the CPF?</p> <p>10 <b>A. Okay, so the entrance to the IBO was a security sliding</b></p> <p>11 <b>gate. The lay down yard was a junk yard. There was no</b></p> <p>12 <b>people in there.</b></p> <p>13 Q. So there was no sliding motorized gate there?</p> <p>14 <b>A. No, absolutely not.</b></p> <p>15 Q. Thank you. Now, let's just consider what you said about</p> <p>16 the handover to SSI and the implications for the</p> <p>17 monitoring of the guards. I am not going to take you</p> <p>18 back through all the documents. They are there and if</p> <p>19 anything I summarise is incorrect you say so.</p> <p>20 Quarter 2 review. Quarter 4 review. Security</p> <p>21 management plan. Essentially what you said was some</p> <p>22 incidents have been identified of security not being</p> <p>23 carried out as it should be and by that I mean access</p> <p>24 control issues of the sort we've already discussed?</p> <p>25 <b>A. Are you referring to the security breaches?</b></p> <p style="text-align: center;">Page 279</p>
<p>1 yard which we can see on the preceding page.</p> <p>2 Interestingly, perhaps, there is a similar entry, second</p> <p>3 entry from the bottom, entry exit points, third column</p> <p>4 along:</p> <p>5 "Install motorized vehicle sliding gates on all main</p> <p>6 entrances."</p> <p>7 The same recommendation as we have just seen in</p> <p>8 relation to the BdV and on the right-hand side it says:</p> <p>9 "Swing or sliding gates installed. Measures in</p> <p>10 place."</p> <p>11 <b>A. Okay, so what you do -- it's badly worded but</b></p> <p>12 <b>effectively what that is saying is swing and sliding</b></p> <p>13 <b>gates, gate measures are currently in place is what it's</b></p> <p>14 <b>saying.</b></p> <p>15 Q. Yes, I think it said it is in black. I think it is in</p> <p>16 green?</p> <p>17 <b>A. Yes, it is.</b></p> <p>18 Q. Certainly on my version, which means it is completed.</p> <p>19 The red are the ones that require things to be done.</p> <p>20 Just so we are clear, there was no sliding motorized</p> <p>21 gate at this point at the CPF, was there?</p> <p>22 <b>A. To be clear, the CPF and the IBO were subject to</b></p> <p>23 <b>a complete overhaul and construction change to change</b></p> <p>24 <b>the whole entry/exit on the CPF. So although you have</b></p> <p>25 <b>these individual boxes here, if you refer to, and</b></p> <p style="text-align: center;">Page 278</p>	<p>1 Q. Yes.</p> <p>2 <b>A. Yes, yes.</b></p> <p>3 Q. But things are working out, bedding in issues are in</p> <p>4 short being overcome and at some point you might have</p> <p>5 gone further and say they are close to having been</p> <p>6 overcome?</p> <p>7 <b>A. I wouldn't go that far but there were definitely --</b></p> <p>8 <b>there was a step change in cooperation, sure.</b></p> <p>9 Q. And the guards who were in place who were doing the same</p> <p>10 work were the same guards who had been in place</p> <p>11 throughout the time that liaison were directly managing</p> <p>12 those guards?</p> <p>13 <b>A. Because the guards weren't the problem. It was the</b></p> <p>14 <b>management of the -- it was the management of the guards</b></p> <p>15 <b>that was the problem.</b></p> <p>16 Q. They were the same people, weren't they?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. They had been trained to standards which the liaison</p> <p>19 team had trained them to?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. What had been found was that certainly on occasions they</p> <p>22 had not done their job properly?</p> <p>23 <b>A. Yes, agreed.</b></p> <p>24 Q. You have heard evidence from a number of people who have</p> <p>25 given evidence to this inquest which might suggest that</p> <p style="text-align: center;">Page 280</p>

1 before the summer of 2012 the guards didn't always do  
 2 their job properly. They didn't always close gates when  
 3 they should or carry out searches?  
 4 **A. I wouldn't purport to say that it was perfect before the**  
 5 **SSI took over but I'm not aware of a single security**  
 6 **breach pre-SSI that involved the guards not doing their**  
 7 **work. I'm not going to stand here and say they were**  
 8 **perfect.**  
 9 Q. If they didn't close the gates as they should do in  
 10 accordance with the processes that would be a security  
 11 breach, wouldn't it?  
 12 **A. There was no process to close gates pre July 2012.**  
 13 Q. The outer gate, the sliding gate, should be kept closed  
 14 shouldn't it?  
 15 **A. Not pre July 2012. July 2012 we had the VBIED threat,**  
 16 **which got detailed. In addition to that we had**  
 17 **information come from Enafor, our drilling contractor.**  
 18 **I wrote -- can I finish this because this is something**  
 19 **which keeps coming round in different forms? So I wrote**  
 20 **a detailed note which went to all the JOC members in**  
 21 **ISG. All the JOC members in In Amenas. BP security,**  
 22 **Statoil security and the Sonatrach presidents. And in**  
 23 **that I detailed that VBIED had been identified as**  
 24 **a clear potential threat now. I then wrote a detailed**  
 25 **summary of what a VBIED was, how you counter a VBIED and**  
 Page 281

1 **what measures should be in place at all sites to counter**  
 2 **that security risk. I then forwarded that to all the**  
 3 **people I listed. Further to that Paul Morgan had**  
 4 **a meeting with Mark and I don't know who else on site**  
 5 **and an agreement was made at that point in the light of**  
 6 **the note that I had sent that from now on that gate**  
 7 **would be closed in off peak periods. Furthermore, BP**  
 8 **then responded to that and said while we recognise this**  
 9 **is something we need to keep an eye on, and this is**  
 10 **a clear indication of the security risk, that they don't**  
 11 **see the threat level within the country as having**  
 12 **changed.**  
 13 **So there's my lead and my oversight and there's me**  
 14 **demonstrating that in light of this information this is**  
 15 **what we should do.**  
 16 Q. Right, Mr Wigg, core bundle, divider 9, instructions for  
 17 security officers at the site.  
 18 **A. Okay, yes.**  
 19 Q. March 2009.  
 20 **A. Yes.**  
 21 Q. Turn over, please, I am afraid, if you use the internal  
 22 pagination it would certainly help me.  
 23 **A. Okay.**  
 24 Q. Number 8.  
 25 **A. Yes.**  
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1 Q. Access to the vehicles, 3.9 at the bottom:  
 2 "Only those vehicle residing on the base may enter  
 3 the base. Access to all other vehicles must be  
 4 authorised by the OLC. The gate to the north of the  
 5 camp must be kept closed until the identification of the  
 6 vehicle and of the passenger has been completed until  
 7 access is authorised."  
 8 Doesn't that require the gate to be kept closed?  
 9 **A. This refers to -- (a) it does not refer to the main**  
 10 **entrance that we are talking about at the BdV, it refers**  
 11 **to the companies camp and secondly, these procedures are**  
 12 **from 2009. They were updated or should have been**  
 13 **updated anyway, by the SSI when we opened the BdV.**  
 14 Q. So requirements to carry out checks of vehicles and  
 15 checks of people, they were all in place  
 16 before July 2012?  
 17 **A. Absolutely.**  
 18 Q. And if people who have given evidence to suggest that  
 19 that wasn't always done before July 2012 are correct  
 20 then those would be security breaches?  
 21 **A. No, not necessarily.**  
 22 Q. They wouldn't be security breaches?  
 23 **A. Well, no -- okay, so when you have got non-project**  
 24 **personnel who have no authorisation to be on site and**  
 25 **the guards have been expressly given orders not to let**  
 Page 283

1 **non-project personnel on site, and you find families,**  
 2 **civilian families camped in your car park, that**  
 3 **represents a security breach.**  
 4 Q. Of course it does.  
 5 **A. If somebody, a project person, who is known to the**  
 6 **guards to be working on that project comes through and**  
 7 **their vehicle isn't searched in the same way that you**  
 8 **are familiar with the guys that come in and out of this**  
 9 **court every day, that's not necessarily a security**  
 10 **breach. That needs reprehension, it needs fixing but it**  
 11 **is not -- it is of a different severity level, if that**  
 12 **makes --**  
 13 Q. And an OLC was present at this site and one of his  
 14 functions was to monitor how the guards carried out  
 15 their job?  
 16 **A. Yes, within his capability to do so.**  
 17 Q. Of course. Again, trying to do this as quickly as  
 18 possible. Risk assessments. You explained that you did  
 19 have a role in the production of risk assessments?  
 20 **A. Yes, yes.**  
 21 Q. I think you appear to be suggesting well this was all  
 22 just copied again from a BP risk assessment?  
 23 **A. It wasn't quite as lacksadaisical as that. Bi-annually**  
 24 **the BP regional risk assessment would be updated and the**  
 25 **risk values associated to that would be subject to**  
 Page 284

<p>1 <b>debate and confirmation from people as high as Andy</b>  2 <b>Collins and that risk assessment would then be passed to</b>  3 <b>us so that we could then update ours in line with what</b>  4 <b>the shareholders regard the risk to be.</b>  5 Q. No doubt you took into account whatever was in the BP  6 risk assessment but surely you had the function to carry  7 out an assessment of risks at In Amenas?  8 <b>A. Okay, are we talking risks -- okay, so on an individual</b>  9 <b>security measure effectiveness if you like, yes, so, for</b>  10 <b>example, if we saw a gate and we weren't happy with it</b>  11 <b>Fitz or Paul may carry out a task risk assessment on</b>  12 <b>site and say we don't think this gate is up to it.</b>  13 Q. Sorry, I will let you finish. Let us do it quickly.  14 Behind divider 15 in the core bundle, the JV risk  15 assessment now begins at page 184.  16 <b>A. Okay.</b>  17 Q. Keep your hand there. You see top right, primary risk  18 18, residual risk 14?  19 <b>A. Yes.</b>  20 Q. A variety of risk comments identified and then a number  21 of actions in place identified?  22 <b>A. Yes, that's right.</b>  23 Q. All of which are required to be in place?  24 <b>A. Yes.</b>  25 Q. Yes?</p> <p style="text-align: center;">Page 285</p>	<p>1 <b>BP one we have domestic and international terrorist</b>  2 <b>group, impact 5, probability 4, manageability 4. So</b>  3 <b>where's the difference?</b>  4 Q. No difference in that particular entry in the actual  5 impact and probability figures.  6 <b>A. Okay.</b>  7 Q. A difference in the risk comments, a difference in the  8 actions in place. All right?  9 <b>A. Right, okay, if you go through these line by line you'll</b>  10 <b>probably find they're not quite as different -- I can</b>  11 <b>see rolling them up. If you start -- do you want me to</b>  12 <b>go through them?</b>  13 Q. No, because I can summarise it for you. Of course there  14 are similarities between the two. You wouldn't expect  15 anything different, would you?  16 <b>A. No, absolutely not.</b>  17 Q. But what I am suggesting to you is that there was an  18 assessment undertaken of the risks at In Amenas which is  19 the assessment that was undertaken independently,  20 I certainly hope so, of any Algeria wide security risk  21 assessment provided by BP?  22 <b>A. Yes, as I have pointed out, at site and on the JV at</b>  23 <b>a tactical level we assess the security risks and our</b>  24 <b>ability to counter those security risks. The overall</b>  25 <b>threat scores and threat level scores were attributed by</b></p> <p style="text-align: center;">Page 287</p>
<p>1 <b>A. Yes.</b>  2 Q. And the primary risk assessed at 18, residual risk at  3 14?  4 <b>A. Yes.</b>  5 Q. Right. Keeping your hand there go back to page 181.  6 <b>A. Yes.</b>  7 Q. This is the BP Algeria security risk assessment. So  8 this is for the whole country produced by BP?  9 <b>A. That's right, I recognise it.</b>  10 Q. In fact you see different risk comments. Different  11 actions in place and the primary risk is different on  12 this document. It is assessed at 17 and the residual  13 risk at 13 for the country as a whole?  14 <b>A. Because if you refer back to the JV one we've included</b>  15 <b>pipeline security. We have given impact and probability</b>  16 <b>scores for that and they're aggregated to give you</b>  17 <b>a primary and residual risk. Whereas on the BP one</b>  18 <b>they're not aggregated because they have taken that line</b>  19 <b>item as one --</b>  20 Q. Of course.  21 <b>A. -- threat.</b>  22 Q. What you have done --  23 <b>A. No, if you take domestic and international terrorist</b>  24 <b>groups we have an impact of 5, a probability of 4 and</b>  25 <b>a manageability of 4 in the JV. If we look back to the</b></p> <p style="text-align: center;">Page 286</p>	<p>1 <b>the shareholder. If you look within the JV and, you</b>  2 <b>know, you can put this question to any management member</b>  3 <b>of the JV, and ask them if there was a forum or</b>  4 <b>somewhere we sat down and went through the risks, the</b>  5 <b>impact probability and manageability scorings of</b>  6 <b>a terrorist attack, I can assure you they'll all say no</b>  7 <b>because I would hope I would have been there. So unless</b>  8 <b>it happened outside of me being there --</b>  9 Q. Somebody has gone through these different points and  10 identified risk assessments for each of these items?  11 <b>A. Sorry, where is the risk assessment?</b>  12 Q. Page 184, Mr Wigg, is the risk assessment?  13 <b>A. Yes.</b>  14 Q. We just looked at it?  15 <b>A. Yes.</b>  16 Q. Somebody carried out an assessment of the risk of  17 terrorism generally and came up with the figures in the  18 yellow column?  19 <b>A. Yes, BP.</b>  20 Q. It is not the BP figure, is it? Because we have just  21 looked at the BP document.  22 <b>A. So let us take line item A. Line item A on the BP is</b>  23 <b>domestic and international terrorist groups --</b>  24 Q. Mr Wigg, if we can shortcut this. I understand that  25 item 1A on the BP Algeria security risk assessment</p> <p style="text-align: center;">Page 288</p>

72 (Pages 285 to 288)



1 includes domestic and international terrorist groups?  
 2 **A. Yes.**  
 3 Q. It identifies the impact and probability in the same  
 4 numbers as appear on the JV risk assessment, right?  
 5 **A. Yes.**  
 6 Q. In addition to that in the JV risk assessment somebody  
 7 has carried out assessments more generally of a number  
 8 of things which aren't the same as appear on the BP  
 9 document?  
 10 **A. I think what you are talking about is the column**  
 11 **entitled "Risk comment".**  
 12 Q. Overall the risk of terrorism in the top line of the BP  
 13 assessment is different to the overall assessment in the  
 14 JV document?  
 15 **A. Not at all, no. The only bit that's slightly different**  
 16 **is the comment on the risk.**  
 17 Q. I think we can see the figures on the top entry of the  
 18 BP document are 17 and 13. On the JV document they are  
 19 18 and 14?  
 20 **A. No, they're the aggregated scores for that item. So on**  
 21 **the JV one it's item 1 and if you look at line item A,**  
 22 **domestic and international terrorist groups, it has an**  
 23 **impact of 5, a probability of 4 and a manageability of 4**  
 24 **on both the BP and JV risk assessments.**  
 25 Q. I am not going to press the point any further. I am  
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1 sure it is there to be seen.  
 2 Let us just move on -- I think finally -- to  
 3 a couple of things just so we understand what role you  
 4 actually played in some things.  
 5 Post the incident at Tamanrassat and the attack in  
 6 La Recule we have seen, I am not sure they are in the  
 7 core bundle but there are documents where you again  
 8 provide similar sort of email communication to the one  
 9 we have seen post the French intervention in Mali,  
 10 right?  
 11 **A. Yes.**  
 12 Q. So again, you become aware of that event, incident, and  
 13 you provided some communication in which you say this is  
 14 what has happened and in fact you say nothing much has  
 15 changed or nothing needs to be done differently.  
 16 Following those attacks is it right that you actually  
 17 liaised with the military colonel for the region where  
 18 those attacks took place?  
 19 **A. No.**  
 20 Q. You didn't attend a meeting with the colonel to discuss?  
 21 **A. I attended regular meetings with the colonel in Teg.**  
 22 Q. Did you attend a meeting with the colonel where these  
 23 incidents took place who was responsible for the  
 24 military in that region and considered with the colonel  
 25 the events that had taken place?  
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1 **A. No.**  
 2 Q. You did not do that?  
 3 **A. No.**  
 4 Q. And at no stage have you received information from that  
 5 colonel to set out his views on whether or not the risk  
 6 had changed to In Amenas in light of the Tamanrassat or  
 7 Ourgla incidents?  
 8 **A. Let me give you some insight into this. The only**  
 9 **colonel that we would have any real contact with was**  
 10 **a colonel that was based in Teg in In Salah Gas who was**  
 11 **responsible, it was his unit, if you like, that provided**  
 12 **the troops to protect Teg, Reg and the southern fields**  
 13 **and the only reason we had meetings with him is because**  
 14 **he was based in Teg so we could see him. And**  
 15 **conversations with him were pretty much exactly as Fitz**  
 16 **has described with his captain in In Amenas, which is**  
 17 **very much you will do this, you won't do this.**  
 18 Q. And as Mr Fitzpatrick described to get as much  
 19 information that he was able to provide about the  
 20 incidents that had occurred or risks that arose?  
 21 **A. No, the colonel was a very astute man and he's not going**  
 22 **to discuss matters of security of his sovereign state**  
 23 **with an expat liaison officer from BP.**  
 24 Q. You are not a liaison officer from BP, are you?  
 25 **A. No, but that's how he considered us. But that's -- to**  
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1 **give some insight into that, that is a legacy of before**  
 2 **Statoil joined the JV.**  
 3 Q. Just finally this: you were asked about the construction  
 4 of a citadel, which I think is some sort of bunker which  
 5 would be --  
 6 **A. A safe haven.**  
 7 Q. Safe haven, citadel, bunker and I think the idea was it  
 8 would be possible for people to go straight to it in the  
 9 event of an attack and you explained some of the  
 10 potential problems with that sort of structure?  
 11 **A. Yes.**  
 12 Q. Would it also potentially create a greater risk to the  
 13 people who were in it because they would all be gathered  
 14 in one place and identified as being in that one place  
 15 and solely dependent on the ability of that structure to  
 16 withstand any further attack from terrorists?  
 17 **A. Yes, that would definitely be a consideration and**  
 18 **ultimately the use of safe havens and other measures, it**  
 19 **is a judgment call. But, yes, you're absolutely right.**  
 20 MR POPAT: Thank you.  
 21 MR FERGUSON: No questions thank you.  
 22 THE CORONER: Thank you very much. I am sorry we have kept  
 23 you so late but thank you.  
 24 (The witness withdrew)  
 25 THE CORONER: Is Mr Lord here still? My information is that  
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<p>1 he is going to be or he is not going to take very long 2 so I think given he has waited here all day we will deal 3 with him now. 4 MR MIKE LORD (sworn) 5 Questions from MS DOLAN 6 THE CORONER: I am sorry we have got to you very late. 7 MS DOLAN: Mr Lord, can you give your full name please? 8 <b>A. Michael Peter Lord.</b> 9 Q. And I think you are the CEO or director of the AFMC? 10 <b>A. I'm the joint director, yes.</b> 11 Q. Just two aspects I want to ask you about arising from 12 your statement. First of all, there was a time when 13 AFMC staff did carry weapons and then that stopped. Can 14 you tell us about that? 15 <b>A. In fact, AFMC didn't carry weapons. It was a time when 16 Sterling was a contractor to the JV, we carried weapons.</b> 17 Q. And I think you were asked to stop that? 18 <b>A. We were informed we had to surrender our weapons.</b> 19 Q. And did you make any representations about that? 20 <b>A. It wasn't a negotiation. It was a direct directive.</b> 21 Q. I understand from your witness statement you say you 22 travelled to Algeria to make representations about it. 23 However on the direction you did remove all firearms 24 from your staff. Why did you want to make 25 representations about it?</p> <p style="text-align: center;">Page 293</p>	<p>1 <b>they would pick up the phone or email me direct. So I'm 2 not aware that Paul wanted to leave. I knew there were 3 some -- Paul was probably not in the right place.</b> 4 MS DOLAN: Thank you, I have no more questions but 5 Mr Ritchie I think has. 6 Questions from MR RITCHIE 7 MR RITCHIE: Mr Lord, I represent the family of Carlos 8 Estrada. Sorry it is so late in the day. One of your 9 exhibits to your witness statement is marked ML101. 10 Could you take the bundle -- 11 <b>A. Yes, sir.</b> 12 Q. -- and turn to that? 13 <b>A. Is it green?</b> 14 Q. Well, it appears it is blue. So you will find in there 15 a tab numbered 19 and behind that I am looking at ML101. 16 <b>A. Which is the contract for liaison.</b> 17 Q. That is it. So stop there, the front sheet. The 18 contract between those three and SARL AFMC and it was 19 signed, we see four pages in by Andrew Collins, 20 Mark Cobb and you in June 2011. So if you go to 21 internal page 4 at the start there we see their 22 signatures? 23 <b>A. Yes, and that's --</b> 24 Q. And that is your signature there too? 25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 295</p>
<p>1 <b>A. To convince myself that, you know, this was again about 2 risk assessment so if the risk assessment in country had 3 reduced in the risk then that would have triggered us 4 surrendering weapons. So I wanted to go and make 5 representation to make sure that process had been done 6 and that we -- they could substantiate why we should 7 give our weapons up.</b> 8 Q. Were you satisfied with what you were told? 9 <b>A. I challenged it but as a contractor to somebody like BP 10 and the JV then if you were given that command to give 11 those weapons up you give them up.</b> 12 Q. One other matter, we have seen documentary evidence that 13 Paul Morgan had said that this was to be his last 14 rotation and that he had decided he wanted to relocate 15 to Hassi and be reassigned. Is that a matter you are 16 aware of? 17 <b>A. No, I can't comment on that.</b> 18 Q. Is that a matter you would have been aware of if one of 19 your staff was finishing and not going back to -- 20 <b>A. I would have thought it would have been brought to my 21 attention. I am the contract signature so from a 22 personnel point of view, yes. But I have no direct 23 email from Paul and I have to say that the liaison team, 24 because they have been with us so long, most of them 25 have been with us 12, 15 years, there was no hierarchy,</b></p> <p style="text-align: center;">Page 294</p>	<p>1 Q. And SARL AFMC is an Algerian registered company, isn't 2 it? 3 <b>A. It is a 100 per cent Algerian entity.</b> 4 Q. Fine. If we go to page 3 of this document, so just 5 before page 4, we see that the contract was limited 6 1,609,889,884 Algerian dinars. That is about 12 million 7 quid at today's exchange right? 8 <b>A. If you did it at 1:33 because that is the dinar rate.</b> 9 Q. So quite a big contract, 12 million quid? 10 <b>A. Yes.</b> 11 Q. Can I turn then to the index to the subclauses. You 12 will see that after page 4 but it returns to page 1 so 13 we are going to take the pages very gently. So after 14 page 4 we go to page 1, are you with me, Mr Lord? Turn 15 from page 4, turn over and go to an index, section 2 16 which happens to be renumbered page 1. Are you with me 17 still? Start at the front, please. I knew this was 18 going to be tricky. Go to page 4 which has the 19 signatures on it. 20 <b>A. I'm there.</b> 21 Q. And then just turn over a page? 22 <b>A. Yes.</b> 23 Q. And we are back to page 1? 24 <b>A. We are.</b> 25 Q. It is section 2. I am going to turn to liabilities and</p> <p style="text-align: center;">Page 296</p>

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<p>1 indemnities, which is clause 9 and you will find that on 2 page 4 after page 1, so just turn 1, 2, 3, 4 if you 3 would. Liabilities and indemnities. Are you with me, 4 Mr Lord?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. So clause 9.3 says "Operator", which is the BP JV as you 7 call them in your witness statement, and those others 8 "shall release, defend indemnify and hold harmless 9 contractor group."</p> <p>10 You are contractor group, aren't you, AFMC? So they 11 give you indemnity from and against all and any 12 liabilities for death, illness or injury to any of the 13 operators' personnel. That is BP or JV personnel. So 14 they carry the can for the death of their own personnel. 15 You don't and then you did a vice versa in the clause 16 before. You carry the can for the death for yours or 17 any liabilities?</p> <p>18 <b>A. Right.</b></p> <p>19 Q. And then there is only one more point on this document 20 and that is in relation to security arrangements. Now 21 that I regret to say involves me taking you to 22 section 4. So if you would flick gently through, each 23 section is paginated differently, and see if you could 24 get to section 4. I would be very grateful. Are you at 25 section 4, Mr Lord?</p> <p style="text-align: center;">Page 297</p>	<p>1 other thing which is a specific rule that you had to 2 follow. It is at the top of the next page, the second 3 paragraph, a specific rule laid out in the contract 4 which you signed which they imposed on you:</p> <p>5 "Unarmed guards will man the entrance to control 6 access into all facilities except military camps."</p> <p>7 You didn't have any room for manoeuvre there in 8 accordance with the contract, did you? The BP JV told 9 you it would be unarmed guards, full stop, in the 10 contract. That is the truth of it, isn't it?</p> <p>11 <b>A. Well it's in the contract, sir, and I signed it.</b></p> <p>12 MR RITCHIE: Thank you very much, Mr Lord.</p> <p>13 Questions from MR FLINN</p> <p>14 MR FLINN: Sir, might I just ask one question. Mr Lord, 15 a moment ago you indicated that you said Paul Morgan was 16 not in the right place. I wonder if you could explain 17 what you mean by that?</p> <p>18 <b>A. Well, obviously the team are more than just employees 19 and they've been around a long time so there's a general 20 harmony that you pick up over so long a period of time 21 with working with these guys. They are all very 22 professional individuals and Paul no less. So they are 23 also not frightened of coming forward and saying they 24 were not happy and I believe Paul had made comment that 25 he was unhappy but I don't know whether -- but I can't</b></p> <p style="text-align: center;">Page 299</p>
<p>1 <b>A. I know it at any rate, sir.</b></p> <p>2 Q. Jolly good. I would like internal pagination of 3 section 4, page 6 and it is paragraph 4.1 that I refer 4 you to. Do tell me when you get there.</p> <p>5 <b>A. Security arrangements 4.1.</b></p> <p>6 Q. 4.1 general:</p> <p>7 "The provision of security resources in the 8 operators' facilities and surrounding areas shall be the 9 operators' responsibility."</p> <p>10 That's the JV, BP JV?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. "Whilst the prime responsibility for security will rest 13 on the operator."</p> <p>14 That is the BP JV, isn't it?</p> <p>15 <b>A. Yes, sir.</b></p> <p>16 Q. "The contractor is required diligently to apply and 17 ensure compliance of all personnel with all established 18 security procedures".</p> <p>19 So whatever squabbling there may be about who 20 thought what this is what the contract says about who is 21 responsible for security and it was the BP JV, wasn't 22 it?</p> <p>23 <b>A. I have no doubt that in the contract what it says that 24 who was responsible.</b></p> <p>25 Q. Thank you. I will just turn over because there is one</p> <p style="text-align: center;">Page 298</p>	<p>1 <b>tell you exactly why but I knew there was -- Paul was 2 not feeling quite happy and there was a rumour that he 3 may want to kind of move. But not leave, I think he 4 wanted to go to Hassi Messaoud rather than stay at 5 In Amenas.</b></p> <p>6 Q. So to clarify you had a sense or you had heard a rumour 7 that he wanted to shift away from In Amenas?</p> <p>8 <b>A. What I had heard was that he was unhappy.</b></p> <p>9 Q. And you said you couldn't say specifically why he wasn't 10 happy?</p> <p>11 <b>A. No.</b></p> <p>12 Q. Did you have a general sense of the reasons why he 13 wasn't happy?</p> <p>14 <b>A. No.</b></p> <p>15 MR FLINN: Thank you very much.</p> <p>16 Questions from MR POPAT</p> <p>17 MR POPAT: Mr Lord, you are familiar now with the need to 18 proceed through these documents as quickly as possible. 19 Can I just summarise the contract to see if I have 20 understood your evidence correctly and in doing so 21 perhaps the easiest way of proceeding is you have 22 provided two witness statements to the coroner.</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. And have you read through those statements?</p> <p>25 <b>A. Yes, I have, sir.</b></p> <p style="text-align: center;">Page 300</p>

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<p>1 Q. Can we take it that they remain accurate as an account 2 of your evidence? 3 <b>A. Apart from the poor spelling.</b> 4 Q. That may not be your responsibility but nonetheless they 5 remain an accurate account? 6 <b>A. Yes.</b> 7 Q. If we need to go back to the statements in due course we 8 can do so. We take that as your evidence. The 9 contracts provided that Sterling, AFMC, were experts 10 with proper experience and expertise of assessing 11 security risks in this region? 12 <b>A. We have operated there 20 years and I think it was that 13 experience that gave us that credibility.</b> 14 Q. And you work with Redmed which is an Algerian 15 organisation and have the input of the Algerian 16 organisation? 17 <b>A. Correct.</b> 18 Q. The contract which Mr Ritchie just took you to in part 19 contains a number of clauses and I am not going to go 20 through all of those with you. Just if we look at the 21 first page and the easiest way of looking at it, 22 Mr Lord, may be if you look at the top left-hand corner 23 there are some red words -- 24 <b>A. Yes.</b> 25 Q. -- in the contract and if we use those as the reference Page 301</p>	<p>1 <b>my security obligations are because I would like to read 2 them.</b> 3 Q. Sure. 4 <b>A. Thank you.</b> 5 Q. In that case it will probably help you to see how the 6 contract is put. If you take the numbering at the top 7 left-hand corner in red, page 7. 8 <b>A. Yes.</b> 9 Q. 1.8: 10 "Services shall mean.... [and so on] as is further 11 described at section 4, statement of requirements." 12 Do you have that? 13 <b>A. Yes.</b> 14 Q. Then the performance of services and what you are 15 required to do is on the next page at section 5 and 16 includes the subparagraphs I have just summarised as to 17 your levels of competence and expertise. And at the 18 bottom the page under the heading "Warranty" that you 19 should "exercise all reasonable, skill care and 20 diligence in the performance of the services." 21 Yes? 22 <b>A. Yes.</b> 23 Q. Then the statement of requirements is further on in the 24 document. It begins in fact at page 23, top left-hand 25 corner, and proceeds throughout the next few pages to Page 303</p>
<p>1 point. The second page there, page 2 of 47, is the 2 letter which has the agreement in it and it sets out at 3 the bottom of that page that the contract is issued to 4 engage the contractor, that is you, to provide liaison 5 services in order to ensure security for operator 6 personnel and installations in accordance with the 7 following terms and conditions. 8 And that was the term of the contract? 9 <b>A. Correct.</b> 10 Q. And in the contract, and there are references in 11 different places, it's made explicitly clear if you look 12 just to page 8 at the top, that AFMC has been selected 13 on the understanding that it is the expert and the 14 professional in the type of services involved and that 15 "it shall carry out the services in accordance with the 16 requirements of the contract in accordance with oil 17 field and/or industry best practice and to any 18 specifications/instructions issued from time to time by 19 the operator." 20 Then it goes on throughout the contract to set out 21 what are the security requirements that you are 22 contracted to provide, yes? 23 <b>A. I'd like to take you to the security requirements 24 because we are a liaison company, not a security 25 company. If you would like to take me to where it says Page 302</b></p>	<p>1 set out various things about being accountable for 2 various things and scope of services and more which 3 I can take you through. 4 It includes, if you go over to page 25, details of 5 the different people who are to be employed and the 6 minimum duties they are to hold. 7 Page 25, we have the job description for the liaison 8 manager. It is all set out there. 9 Over the page, by way of example, page 26. This is 10 a liaison supervisor. Second bullet point: 11 "Manage liaison function to assure no deaths or 12 injuries from social or political violence." 13 A few bullet points down: 14 "Manage proactively and set up and lead liaison 15 meetings ..." and so on, yes? 16 <b>A. Sir, I just wanted to make the point that we keep using 17 the word "security" as if two people or four people at 18 In Amenas in a security capacity would have any 19 difference and make a difference to the overall 20 security.</b> 21 <b>The definition, my definition of the liaison role is 22 actually very well described in this where you have the 23 three boxes with the liaison role in the middle. If you 24 can find anywhere it says security on there, then please 25 enlighten me because the liaison role is to oversee and Page 304</b></p>

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<p>1 <b>make comment and give recommendations. Clearly that's</b>  2 <b>what we did and we have done for the BP entities in</b>  3 <b>Algeria for 20 years, not two years, 20.</b>  4 <b>So if you go, please, go back to the box because</b>  5 <b>this is very, very clear of what our function is. And</b>  6 <b>it is the three boxes.</b>  7 Q. Yes.  8 <b>A. I would like to kind of --</b>  9 Q. Thank you. I am really not trying to cut across you.  10 You wanted a reference to security. If you want it it  11 is section 4.0 on page 28 where it refers to security  12 arrangements. But I think I am not disagreeing with the  13 description or summary you have just provided which is  14 also consistent with what you said in your witness  15 statement?  16 <b>A. Right.</b>  17 Q. All I was going to do is say the contract contains a lot  18 of detail about the services you have to provide which  19 include the security arrangements, but fundamentally, so  20 there is no doubt about this, of course overall  21 responsibility remains with the JV, nobody suggested  22 otherwise?  23 <b>A. Okay.</b>  24 Q. But your function or the function of liaison was to  25 provide the advice and the recommendations as you have</p> <p style="text-align: center;">Page 305</p>	<p>1 Q. So it provided, I think Algerian nationals as well --  2 <b>A. We had NLAs.</b>  3 Q. -- who assisted the BP office, separate from the JV?  4 <b>A. Correct.</b>  5 Q. But the BP office in Algiers, and one of their functions  6 specifically was to review newspaper reports and media  7 sources particularly in local languages or dialect and  8 then feed in the information they gleaned from those  9 sources into the BP assessments that we have seen in the  10 weekly --  11 <b>A. This goes back to -- our database went back virtually</b>  12 <b>18 years.</b>  13 MR POPAT: Thank you.  14 MR FERGUSON: No questions, thank you.  15 THE CORONER: Thank you very much, Mr Lord. I am sorry --  16 can I just say that it has been such a long day.  17 I appreciate that puts a strain on everybody but these  18 witnesses are all leaving the country tomorrow. Can  19 I just ask this: that so far as all interested persons  20 are concerned if any other days look on reflection to be  21 similarly tight please will everyone just alert Ms Dolan  22 to that otherwise we'll work on the basis that what is  23 proposed is feasible. But perhaps everybody could have  24 a look at that tomorrow morning because I think or  25 I hope you all know we are not starting until 2 o'clock</p> <p style="text-align: center;">Page 307</p>
<p>1 just summarised, yes?  2 <b>A. Yes.</b>  3 Q. Thank you. As I said to you you said it in your  4 statement so I was just trying to shortcut it but in  5 your second statement you say the AFMC staff would  6 provide a safety review and military liaison function,  7 yes?  8 <b>A. That's correct.</b>  9 Q. I just wanted to ask you very briefly about two other  10 short points. One was, you mentioned that your expat  11 officers were required to hand in their weapons?  12 <b>A. Yes.</b>  13 Q. We had heard from Mr Fitzpatrick that the law changed in  14 Algeria and so expats were no longer allowed to hold  15 weapons after I think it was 2002 or 2003. Is that your  16 understanding as well?  17 <b>A. I couldn't comment on the law changing, no.</b>  18 Q. You were asked to and you did?  19 <b>A. Yes.</b>  20 Q. That I understand. I just wanted to know whether you  21 agreed with that.  22 The final point was this: the AFMC organisation also  23 provided two liaison staff to work at the BP Algiers  24 office, didn't it?  25 <b>A. Yes, over the period up to 6 or 8.</b></p> <p style="text-align: center;">Page 306</p>	<p>1 tomorrow.  2 But I repeat my thanks to everybody. I am very  3 grateful. So 2 o'clock tomorrow.  4 (6.25 pm)  5 (The inquest adjourned until the following day at 2.00 pm)  6  7  8  9  10  11  12  13  14  15  16  17  18  19  20  21  22  23  24  25</p> <p style="text-align: center;">Page 308</p>

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