

1 Wednesday, 29 October 2014  
2 (10.15 am)  
3 THE CORONER: Can I just say something before we start this  
4 morning about questions which were raised last week.  
5 First of all, as to information about the disclosure  
6 process and our future timetable, I anticipate dealing  
7 with that tomorrow morning when Mr Underwood will be  
8 here and I think Mr Garnham will be here too. I am sure  
9 you are more than capable of dealing with it but it just  
10 seems to me sensible to deal with that tomorrow morning.  
11 MR FLINN: Thank you, sir.  
12 THE CORONER: But there was a second request from Mr Garnham  
13 which I will deal with now and it arose in this way: the  
14 disclosure process is not yet concluded for the purposes  
15 of these proceedings and one question which has arisen  
16 is whether Mr Bristow and Mr Roper should be called at  
17 this stage or whether they should be deferred until the  
18 end of the disclosure process lest that should give rise  
19 to anything for the inquest which they were able to help  
20 us with.  
21 I can quite understand that some of the interested  
22 persons would like those witnesses called now so that as  
23 much progress as possible is made and so that what they  
24 have to say is known.  
25 Nonetheless, I have no doubt at all that the right

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1 course is to defer them so that they are only called  
2 once and at a time when everyone has to hand all  
3 material for the inquests which the disclosure process  
4 may give rise to and it is not yet clear whether or not  
5 we are in that position.  
6 Each of the two witnesses has in fact made  
7 a statement, Mr Roper only recently, but I am afraid  
8 that those will have to suffice in the meantime as  
9 a broad indication of what they have to say. Of course  
10 that may be amplified by questioning in due course but  
11 for the moment, I am afraid, that will have to suffice.  
12 I should add that I made that decision at the  
13 weekend since when I have been told about difficulties  
14 with their availability in the short term but that was  
15 not a factor in my decision.  
16 All right, so that's the two questions, that's that.  
17 We will come back, as I say, tomorrow morning to  
18 information about the disclosure process and the future  
19 timetable.  
20 Yes.  
21 MS DOLAN: Sir, the first witness this morning is  
22 Mr Braziel.  
23 MR COLIN BRAZIEL (sworn)  
24 Questions from MS DOLAN  
25 MS DOLAN: Good morning, Mr Braziel. Can you give us your

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1 full name please.  
2 **A. Colin James Braziel.**  
3 Q. And what is your current position?  
4 **A. I'm currently the managing director of Griffin Security**  
5 **Group, an independent security consultancy company.**  
6 Q. Can you give us a brief resume of your CV to tell us  
7 about what expertise and experience you have in the  
8 security field?  
9 **A. Yes, indeed. I served in the Royal Air Force for**  
10 **27 years, I started in 1968 and retired in 1994. During**  
11 **that time I was a member of the security and police**  
12 **branch of the Royal Air Force. I engaged in counter**  
13 **terrorism and counter intelligence work for the majority**  
14 **of that time and upon -- part of that included**  
15 **protection of the critical national infrastructure,**  
16 **I spent four years as a surveyor looking after that.**  
17 **When I retired I established my own security**  
18 **consultancy company, for the last 20 years, and we work**  
19 **on a global basis providing support to government and**  
20 **private companies.**  
21 Q. I think you were instructed by the then senior coroner  
22 to provide an expert report --  
23 **A. Yes, I was.**  
24 Q. -- on security aspects in this case. I think you were  
25 given a number of documents including all the witness

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1 statements of those that we have heard evidence from?  
2 **A. Yes, I was.**  
3 Q. And have you also been provided with transcripts of  
4 evidence from these hearings?  
5 **A. Yes, I have read all the transcripts from each day.**  
6 Q. And I think you have attended on some days. But I think  
7 there is one statement you haven't been provided with  
8 which is the second statement of Mr Porter which goes to  
9 changes since the events?  
10 **A. No, I have not.**  
11 Q. Turning then to your report --  
12 THE CORONER: Ms Dolan, can I just say as to that, can  
13 I understand why that is so that Mr Braziel's evidence  
14 as it were, will be on any view without regard to that,  
15 it may yet come. Let's just see how things turn out but  
16 it may yet be in the course of his evidence that there  
17 will come a time later on when it might be as well for  
18 him to see it, but I think if we can get as far as we  
19 can without that's probably the best thing.  
20 MS DOLAN: Turning to your report and you set out at part 4  
21 for those who are following, I don't need to take you to  
22 it at this point, you say, one of the first principles  
23 of security is defence in-depth.  
24 **A. That's correct.**  
25 Q. Can you explain what you mean by that, please?

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<p>1 <b>A. Yes, defence in-depth is quite simply explained at</b>  2 <b>looking after the core element in the centre and then</b>  3 <b>rings of security that come out from that central point</b>  4 <b>providing added levels of security. The way we describe</b>  5 <b>it generally is that an onion ring. The centre of the</b>  6 <b>onion is what you are trying to the protect and then the</b>  7 <b>various rings of that onion are the various levels of</b>  8 <b>security.</b></p> <p>9 Q. We have heard from many witnesses at the inquest of how  10 there was what was perceived to be rings of security  11 provided by the Algerian military and Gendarmes?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. -- around the In Amenas base, that being the border  14 security, then the military protected zone and then  15 closer to the base the Gendarmes protected zone?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. In terms of defence in-depth and rings of security, what  18 was your view of what was in place then?</p> <p>19 <b>A. If we start at the outer level we start with the border,</b>  20 <b>a very long border, very, very difficult to protect and</b>  21 <b>the fact that the military had deployed 7,000 troops to</b>  22 <b>that area in the desert, many hundreds of square miles,</b>  23 <b>and Gendarmes on the border to protect that border did</b>  24 <b>not mean that it was necessarily tightly secured. In</b>  25 <b>fact, it would be impossible to secure it without some</b></p> <p style="text-align: center;">Page 5</p>	<p>1 <b>southern deserts with the tribes and the manner in which</b>  2 <b>the country was controlled provided a level of</b>  3 <b>protection of people in that country. Once the regime</b>  4 <b>fell it was an open border from the Libyan side and,</b>  5 <b>therefore, you've lost half of your protection already.</b>  6 <b>So anybody approaching from the Libyan side probably</b>  7 <b>would be undetected and able to move around freely.</b></p> <p>8 Q. You comment on page 30 of your report that your  9 perception was the design of the inner security zone was  10 based on the assumption that the military would protect  11 the facility from attack?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Can you expand upon what you mean by that?</p> <p>14 <b>A. Yes, in fact, reading the evidence of many witnesses</b>  15 <b>they conclude quite clearly that it was never designed</b>  16 <b>to withstand an attack and I would support that view,</b>  17 <b>that there was insufficient security measures in place</b>  18 <b>to protect against an armed assault on that facility.</b>  19 <b>And they relied on the assumption that first of all, the</b>  20 <b>Algerian military would stop someone infiltrating across</b>  21 <b>the border and the desert towards the outskirts of the</b>  22 <b>In Amenas facility and that the local Gendarmes will</b>  23 <b>stop anybody that got close to.</b></p> <p>24 Q. What might be said is this is a very reasonable  25 assumption because we have a situation here where this</p> <p style="text-align: center;">Page 7</p>
<p>1 <b>form of mechanical defence or electronics to assist</b>  2 <b>that.</b></p> <p>3 Q. Your view that it was impossible to protect, is that  4 something that one would need to have security expertise  5 to be appraised of?</p> <p>6 <b>A. No, I don't think that's -- I think there's</b>  7 <b>a misconception that when one reads that 7,000 troops</b>  8 <b>have been deployed to an area that you have got 7,000</b>  9 <b>troops holding hands to protect a border. Clearly you</b>  10 <b>don't. They work in shifts. They're spread out in</b>  11 <b>various troops or platoons or however the Algerian</b>  12 <b>military look after their area and there are gaping</b>  13 <b>holes. There is no fence, there is no surveillance</b>  14 <b>system in place at all because the Algerians have not at</b>  15 <b>that time purchased any surveillance equipment even</b>  16 <b>though they had reviewed doing so.</b></p> <p>17 Q. We heard from Mr Fulcher last week that in his view  18 there was some relevance to the fact that there was the  19 fall of the regime in Libya on one side of the border.  20 What's your view of that?</p> <p>21 <b>A. Yes, my experience, I've actually done some work in</b>  22 <b>Libya, in fact I have worked in north Africa on</b>  23 <b>assignments over the last number of years. During the</b>  24 <b>period that the Gaddafi regime was in place of course</b>  25 <b>Libya was quite a secure country. And even in the</b></p> <p style="text-align: center;">Page 6</p>	<p>1 isn't just an expat facility. The centre of it is being  2 owned and being run by Sonatrach, or they are a  3 50 per cent partner in it, who are a government company.  4 The importance of the petrochemical industry to Algeria  5 and the importance to the Algerian regime of there not  6 being any attacks on these important infrastructures is  7 something which could give some comfort to those who are  8 working at In Amenas, that the military and the  9 Gendarmes would be pulling out all the stops essentially  10 to protect them?</p> <p>11 <b>A. Yes, but that assumption was never tested or indeed</b>  12 <b>there was never any confirmation of the level -- from</b>  13 <b>what I have read, there was never any confirmation of</b>  14 <b>the level of protection that they would be providing to</b>  15 <b>the In Amenas or indeed any other petrochemical facility</b>  16 <b>in the area.</b></p> <p>17 Q. What we have heard many witnesses saying though is that  18 because of the way in which the Algerian military, and  19 perhaps any military might work, civilians can't make  20 enquiries about operational matters and operational  21 decisions and may not be able to test those assumptions  22 because it's not information that's going to be shared  23 with them. That may be true in any military and  24 particularly it seems to have been suggested that that  25 is the culture of how the Algerian military would work.</p> <p style="text-align: center;">Page 8</p>

1 Does that not mean that the JV is not in a position to  
 2 test this?  
 3 **A. I think Mr Fulcher made the point on Friday when I was**  
 4 **here it takes many years to build up a relationship with**  
 5 **various organisations, something I and the people that**  
 6 **have worked with me in the past have done. You build up**  
 7 **relationships which enable you to find out information**  
 8 **and indeed, given that Sonatrach was a government**  
 9 **sponsored partner of this organisation, you would have**  
 10 **thought that they may well have had contacts that they**  
 11 **could use or indeed the British embassy in Algiers would**  
 12 **have contacts that would be able to, through the**  
 13 **military attache there, would be able to find out had**  
 14 **they been asked some information, I'm sure.**  
 15 **Q. If the circumstances are that they weren't able to do**  
 16 **that and weren't able to get matters --**  
 17 **A. If they could not test the assumptions then they should**  
 18 **not have made those assumptions and they should have**  
 19 **taken alternative measures therefore to protect**  
 20 **themselves.**  
 21 **Q. So when you say if you can't test the assumption you**  
 22 **can't make the assumption?**  
 23 **A. Yes.**  
 24 **Q. The alternative measures, you talk in your report, it is**  
 25 **page 33 for those who are following, about a hardened**  
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1 security perimeter.  
 2 **A. Yes.**  
 3 **Q. Explain what you mean by a hardened security perimeter?**  
 4 **A. I was asked in my report to make some comment about what**  
 5 **levels of physical security might be implemented and so**  
 6 **the reason I have laid that out in the report is to say**  
 7 **that your rings of defence start with hardened**  
 8 **exteriors, the fence line, lighting, fence detection**  
 9 **systems, if I remember right the report then talks about**  
 10 **safe zones, that you leave clear zones. That the**  
 11 **buildings people are living in are strong, strongly**  
 12 **built, secure doors so that they can lock themselves in**  
 13 **properly without someone breaking in et cetera**  
 14 **et cetera. So you take a number of actions to protect**  
 15 **yourself. Now, they had started to do this at In Amenas**  
 16 **because clearly in 2009 I think it was they had assessed**  
 17 **that there was a threat of a vehicle borne attack in**  
 18 **going through the fence line and hence they put the**  
 19 **concrete T bars in which did provide one line of**  
 20 **defence. The problem is that like all fences the**  
 21 **weakness is where you put a hole in it and you've got**  
 22 **gates that weren't particularly secure or indeed on**  
 23 **occasions were just left wide open.**  
 24 **So whereas some elements were put in place they**  
 25 **weren't necessarily completed either and there is**  
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1 **a whole list of security enhancements that should have**  
 2 **been undertaken in their security plan that over**  
 3 **a period of four and a half years were never**  
 4 **implemented. For example, the T bars were never**  
 5 **completed as a piece of work even though it was assessed**  
 6 **that there were still areas that probably needed them.**  
 7 **Q. On that issue then of physical security, as you say;**  
 8 **weakness where there are holes in the line, what is it**  
 9 **then that you say gates can or should provide the gate**  
 10 **security that we see not here?**  
 11 **A. Yes, clearly the -- they had started in provision of**  
 12 **putting a chicane in, the idea of the chicane being to**  
 13 **slow down any vehicle that's approaching so that it can**  
 14 **be stopped and it also means that a vehicle cannot take**  
 15 **a speed run at the first gate which itself should be**  
 16 **secure.**  
 17 **So you are able to stop vehicles at your first entry**  
 18 **gate which should be a strong gate that can't be rammed**  
 19 **in any event. You stop someone at that gate. When**  
 20 **you've agreed that they can go through that gate you**  
 21 **then open that gate but your inner gate remains closed.**  
 22 **They then sit in a sterile area. You close the outer**  
 23 **gate and they can then proceed, having been searched**  
 24 **through into the inner zone if that's what's required.**  
 25 **But they have to be strong, solid gates and they have to**  
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1 **be kept closed.**  
 2 **Q. If a gate is unlocked but a chicane is still in place,**  
 3 **is that not sufficient?**  
 4 **A. If you're leaving the outer gate open, for example, even**  
 5 **though you've never gated the chicane, there's still**  
 6 **sufficient space, having navigated the chicane to gather**  
 7 **speed in order to break through the inner gate,**  
 8 **particularly if it's not a particularly substantial**  
 9 **gate.**  
 10 **Q. Just to be clear, we have seen the picture of the set up**  
 11 **at In Amenas. There isn't a chicane between the inner**  
 12 **gate and the outer gate?**  
 13 **A. No, there wouldn't be.**  
 14 **Q. You are not suggesting there should be a second chicane?**  
 15 **A. No. What I'm saying is you stop people at the outer**  
 16 **gate. You identify who they are. You allow them into**  
 17 **the second zone. You close the outer gate behind them**  
 18 **before you open the inner gate to let them go through**  
 19 **having, if necessary, searched them in that sterile zone**  
 20 **in the middle.**  
 21 **Q. And having brought them to a standstill at that outer**  
 22 **gate?**  
 23 **A. Yes.**  
 24 **Q. What we have seen at In Amenas is that the parking at**  
 25 **the BdV was between the two fences?**  
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1 **A. Mmm. That exacerbates the problem that you have got to**  
 2 **allow far more vehicles into your sterile area than you**  
 3 **really need to. Unless they're operational vehicles**  
 4 **there is no need for these vehicles to enter the site,**  
 5 **which limits the number of times you have got to open**  
 6 **and close the gates.**  
 7 Q. Because it appears to be what's being said is there were  
 8 times, and we have since seen documents which suggests  
 9 there were some agreed times when the outer gate would  
 10 be left open at peak traffic flows for half an hour?  
 11 **A. You could alleviate that totally. I suspect the number**  
 12 **of vehicles which actually needed to go through that**  
 13 **gate at any one time was actually quite limited. It was**  
 14 **for convenience, I suggest, that they were left open so**  
 15 **that people could park closer.**  
 16 Q. What might be said is if you don't have your parking  
 17 between the two fences then passengers, of whatever  
 18 sort, are having to disembark from their vehicles  
 19 outside the secure perimeter, outside the outer fence as  
 20 visitors --  
 21 **A. Yes.**  
 22 Q. -- had to at In Amenas. Surely that of itself creates  
 23 a risk that now staff members are not in a vehicle when  
 24 they're walking around and walking -- there would have  
 25 to be a pedestrian gate into the outer gate?  
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1 **A. It is a balance. It is a balance between what are you**  
 2 **trying to achieve? Is the threat more against the**  
 3 **individual leaving his car and walking through into the**  
 4 **site or trying to bring cars in and leaving the gates**  
 5 **open? I suggest that it's probably less of a threat to**  
 6 **the individual walking in to their site.**  
 7 Q. One of the issues that has been ventilated during the  
 8 evidence is the issue of the guards at the gate, the  
 9 civilian guards at the gate, and at the vehicle  
 10 checkpoints not being armed.  
 11 **A. Mmm.**  
 12 Q. Do you have any comments upon that?  
 13 **A. Yes. I suspect that in order to arm the guards to an**  
 14 **appropriate level would be quite time consuming, costly**  
 15 **and difficult to achieve, and because they're civilian**  
 16 **guards they're not military trained, they're not**  
 17 **designed to repel a forceful attack. Particularly when**  
 18 **you have got Gendarmes who are based at the site who**  
 19 **could equally do that and my expectation as a security**  
 20 **professional would have been that there would have been**  
 21 **at least one armed Gendarme at each entrance 24 hours**  
 22 **a day, probably in a protected sangar.**  
 23 Q. Because?  
 24 **A. Because then he is providing an armed deterrent against**  
 25 **forcible attack and providing some security cover for**  
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1 **the unarmed security guards.**  
 2 THE CORONER: Sorry, just because it may not have been  
 3 picked up, you said probably in a protected, I think you  
 4 said sangar.  
 5 **A. Yes.**  
 6 THE CORONER: By which you mean like a sort of pillbox?  
 7 **A. Yes, in the military that's the way we detect all**  
 8 **entrances to military bases by putting someone in**  
 9 **a military sangar and I have seen it down in some -- in**  
 10 **Lebanon, for example, where I offer advice to**  
 11 **petrochemical facilities there they have armed guards**  
 12 **within sangars, pillboxes, to protect the unarmed guard**  
 13 **at the gate and it also provides a visible deterrent to**  
 14 **anybody who's trying to make a forceful entry through**  
 15 **those gates.**  
 16 MS DOLAN: What might be said though is that this is an  
 17 operational decision of the Gendarmes not something  
 18 which is in the gift of the JV to provide armed men at  
 19 the gate, armed Gendarmes at the gate.  
 20 **A. If the Gendarmes were not prepared to do so, then**  
 21 **I suggest that the JV may have made representation in**  
 22 **order to get suitably qualified armed security guards at**  
 23 **the gates and that might then have encouraged the local**  
 24 **military to say, well actually we will do it. You don't**  
 25 **need to bring your own security guards because you can't**  
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1 **do it. It was a question then of pressure being brought**  
 2 **to bear at the right levels to say well if you won't let**  
 3 **us protect our people then you must provide that**  
 4 **protection instead.**  
 5 Q. What might be said though is that just one chap at the  
 6 gates is not actually going to be that effective from  
 7 the events that happened at In Amenas because when  
 8 a number of people in a vehicle turn up and point their  
 9 guns at the guard, whether it is an unarmed civilian  
 10 guard or a single Gendarme, the threat of those guns  
 11 being pointed at them they're going to open the gate  
 12 anyway?  
 13 **A. I would suggest that if an armed Gendarme had been**  
 14 **a sentry at that gate and had seen an armed assault**  
 15 **taking place he would have opened fire and that would**  
 16 **have delayed them long enough to get the quick reaction**  
 17 **force to actually respond and it might have been just**  
 18 **long enough. It is a delaying tactic again.**  
 19 Q. Because you have mentioned two words, deterring and  
 20 delaying. What is the relevance of that?  
 21 **A. All defence is really designed to deter an attack, to**  
 22 **delay an attack, delay an attack, to detect if something**  
 23 **goes wrong and then to respond. That's the four**  
 24 **elements of it. So you're trying to produce**  
 25 **a deterrent. You're trying to show there's a fence**  
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<p>1 round here, we're protecting this, we're doing something 2 about this facility. Oh we've got armed guards, right. 3 So that is a deterrent.</p> <p>4 So you're trying to deter people from actually 5 coming in and then you put a number of physical barriers 6 in place that actually delay people should they say, 7 actually I'm not that deterred, I'm going to give them 8 whatever, and that's that principle.</p> <p>9 Q. One of the things that seems to be recognised both in -- 10 I think you provided the American petrochemical industry 11 guidance in your report and it is also said in the JV 12 security management plans that whatever security you put 13 in place you can't completely prevent these attacks and 14 risks?</p> <p>15 A. No. It is the level to which you are prepared to invest 16 and are able to provide protection. You could deploy 17 a whole regiment around the outside of that facility and 18 it will be secure, probably. It would be unlikely to be 19 attacked. But they're not prepared to do that, so you're 20 building the levels that says, well, actually, we've got an 21 outer zone which is secured, you can't drive through 22 the fence. We would improve the gates, you can't drive 23 through the gates and within the confines of the 24 compound itself you provide, 25 particularly at BdV, secure living accommodation so that</p> <p style="text-align: center;">Page 17</p>	<p>1 JV for some reason seem to have lumped a number of 2 potential threats together which thereby reduces the 3 threat level.</p> <p>4 Q. I think we are looking -- is that the document at page 4 5 of Mr Porter's appendices?</p> <p>6 A. Yes, it is: under item 1 it talks about domestic 7 international terrorist threat which because of the way 8 this has been calculated by introducing, and I can't see 9 where it's shown in here at the moment, but I know we 10 discussed it or it was discussed on Friday about the 11 inclusion of postal bombs.</p> <p>12 Q. If we turn to that -- that was the BP one. If you turn 13 to page 1. So there is the BP example which I think --</p> <p>14 A. Yes.</p> <p>15 Q. -- was discussed where the BP example on page 1 there 16 has four matters --</p> <p>17 A. Yes, indeed they have and they have used that to reduce 18 their figures in that respect. Whereas what should be 19 happening is each individual line item should be 20 assessed separately. So if there is a threat of 21 a terrorist attack on the site, that is a risk in its 22 own right and should be treated in its own right without 23 reference to other risks.</p> <p>24 Q. So just pausing there. If we then look at the JV one 25 which is at page 4, which to be fair I should point out</p> <p style="text-align: center;">Page 19</p>
<p>1 people themselves are secure within that environment.</p> <p>2 Q. To what extent then is risk assessment a relevant part 3 of --</p> <p>4 A. Risk assessment is vital to this and it needs to be 5 a constant risk assessment that is updated given 6 whatever is, you know, information is available.</p> <p>7 Q. I think you have looked at the policies and procedures 8 documents in respect of risk assessment and comment that 9 they are adequate in your view?</p> <p>10 A. The documentation itself is adequate. It documents what 11 they're doing and what you need to do. It's no more 12 than that. And it's what the security team would just 13 rely on as their guidance document really. The actual 14 risk assessments themselves are probably flawed in the 15 manner in which the information is obtained and 16 recorded.</p> <p>17 Q. Explain what you mean by that?</p> <p>18 A. I think if we take, for example -- this again was 19 discussed Friday and I have read the documentation, in 20 the JV risk assessment that was done on a day unknown, 21 because none of the documents are dated, so we are 22 assuming perhaps it was done in the early part of 2012, 23 but there's no dates on it to know, nor indeed does it 24 show whether it was ever updated during the 12 months 25 before the attack. Within the threat of terrorism the</p> <p style="text-align: center;">Page 18</p>	<p>1 doesn't have four things lumped into it, it has two. It 2 has, I think in the left-hand column, terrorism risk and 3 pipeline security?</p> <p>4 A. Yes, in fact what they have done is lumped, apart from 5 pipeline security, everything into 1A. So you have got 6 carjacking and kidnapping and all these elements, all 7 risks that have been lumped into 1 and thereby by 8 bringing the mitigation to say actually we're protecting 9 against kidnapping because we have a bus and we have 10 armed guards and we protect it so your mitigating action 11 is actually bringing that down, your residual risk 12 numbers down. What it doesn't do is show that you have 13 still a high residual risk of terrorist attack because 14 you haven't got the other mitigating actions in place.</p> <p>15 Q. If we look at this document, if we look at 1A, one still 16 gets, if one looks at 1A alone, a primary risk of 20 and 17 a residual risk of 16 by doing the maths we have been 18 told you do, you multiply 4 by 5 and get 20 for the 19 primary risk and you mitigate it by 4 and it comes down 20 to 16?</p> <p>21 A. Absolutely.</p> <p>22 Q. But if you put pipeline security with that which has 23 a lower primary risk?</p> <p>24 A. You bring it right down to 14 which is a medium risk not 25 a high risk. Whereas you should be assessing them</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

1 **individually. You should be saying: your threat risk is**  
 2 **still 18. Pipeline security is at a much lower risk.**  
 3 Q. I think you said you weren't aware of the date on this?  
 4 **A. No.**  
 5 Q. What frequency of review of these kind of matters would  
 6 you expect to see?  
 7 **A. There is an annual risk assessment done and I suspect**  
 8 **that's what BP and the JV were doing. I would have**  
 9 **anticipated that at least quarterly you would redo this**  
 10 **document in order to update it with the latest**  
 11 **assessments. If there was anything significant, any**  
 12 **change of intelligence, anything that changes any of**  
 13 **these risks or the likelihoods or the like then you**  
 14 **should redo that document and recirculate it and get the**  
 15 **risks signed off by the management team. Again, that's**  
 16 **something that's not shown here as who has actually**  
 17 **signed off on these risks. Is it just the liaison team**  
 18 **that have said: this is it, or has it been approved by**  
 19 **the JV management team?**  
 20 Q. Can I move on to ask you about training of staff because  
 21 what we have seen is instructions given to staff of what  
 22 to do in the event of a terrorist attack which are take  
 23 yourself to your room and hide yourself --  
 24 **A. Mmm.**  
 25 Q. -- and we have also seen the documents where that's

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1 clearly told to people on first arrival at the site.  
 2 **A. Yes.**  
 3 Q. First of all, we have also seen a document which shows  
 4 that the policy is you are told that once when you  
 5 arrive but not refreshed on that at all in subsequent  
 6 terms of, I won't say tour of duty but in subsequent  
 7 rotations.  
 8 **A. Yes.**  
 9 Q. Any comment on --  
 10 **A. Yes, security training should be continuous. It's not**  
 11 **a one-off measure. And that's demonstrated by people**  
 12 **saying, well, yes, I do recall going there and I do**  
 13 **recall them saying there was an alarm. Now was it**  
 14 **a continuous alarm or was it the intermittent alarm?**  
 15 **That caused confusion and there were one or two other**  
 16 **examples probably brought out within the many statements**  
 17 **I have read. It's essential that any security training,**  
 18 **like the health and safety training, is given on**  
 19 **a continuous basis and people should be briefed and**  
 20 **honestly briefed on the security situations that they**  
 21 **are facing and what to do, and also there should be**  
 22 **rehearsals of this. Whilst they rehearsed fire alarms**  
 23 **I'm not aware from what I have read that they ever**  
 24 **rehearsed this possibility of an attack and what to do,**  
 25 **to make sure people did know which alarm and what to do,**

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1 **not go to the muster point, to actually go and lock**  
 2 **yourself away.**  
 3 **So to turn up on your first engagement in In Amenas**  
 4 **and receive part of a short briefing by reading**  
 5 **a PowerPoint presentation seems inadequate to me. There**  
 6 **needs to be some in-depth training to the staff on what**  
 7 **to do in a security situation.**  
 8 Q. But the instructions themselves, which is if this has  
 9 happened and the place has been breached to go and hide,  
 10 do you have any criticism of that as an instruction?  
 11 **A. Given that's the best you can do in those circumstances,**  
 12 **and given the facilities that are available to them,**  
 13 **that probably is the best option and indeed, as it**  
 14 **proved itself, quite a number of members of staff were**  
 15 **able to hide quite successfully and evade detection.**  
 16 Q. There has been some discussion about the provision of  
 17 safe houses. Your view on that?  
 18 **A. To build a safe haven to cope with the numbers of people**  
 19 **that were actually based at In Amenas would be, well,**  
 20 **the building itself would have to be astronomically**  
 21 **large, you would need a number of them because you have**  
 22 **the domestic accommodation, then you have got the CPF**  
 23 **et cetera, so you need several of them. Safe havens**  
 24 **work very well with small groups in small enclosed areas**  
 25 **or indeed in someone's residence. The better option is**

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1 **actually to provide -- the buildings that you have**  
 2 **already on site to, make sure they're secure to provide**  
 3 **a better preventative time, delaying time, so you want**  
 4 **strong secure outer doors on the domestic accommodation,**  
 5 **you want bars on the windows to stop people getting in**  
 6 **et cetera et cetera.**  
 7 **So if you can't build a proper safe haven and that**  
 8 **would be inappropriate here, it just wouldn't work, then**  
 9 **you have got to build something else. If you are**  
 10 **telling them to go and hide they need to have rooms they**  
 11 **can hide in that are safe. So you want strong walls,**  
 12 **strong doors et cetera.**  
 13 Q. Turning to another topic, there has been said, and in  
 14 a statement which I think you have read but it is yet to  
 15 be read out formally at the inquest, that at a drivers'  
 16 meeting the evening before this attack it is alleged that  
 17 a threat was made.  
 18 **A. Yes.**  
 19 Q. If that threat, which was along the lines of  
 20 a suggestion that one of the striking drivers said in  
 21 Arabic words to the effect that negotiations were over  
 22 and the next day there would be a surprise and blood  
 23 would be shed, I am not asking you to come to any  
 24 determination about whether or not that was said or ever  
 25 translated into English, if that was said what action

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<p>1 would you anticipate be taken in response?</p> <p>2 <b>A. I would have expected the Gendarmes to go to full</b></p> <p>3 <b>emergency measures. I would have expected them to</b></p> <p>4 <b>virtually be surrounding that establishment and indeed</b></p> <p>5 <b>calling in for military reinforcements from In Amenas</b></p> <p>6 <b>town in order to protect them until such time as that</b></p> <p>7 <b>threat could either be discounted or indeed if an attack</b></p> <p>8 <b>was made then they could have taken some action against</b></p> <p>9 <b>it.</b></p> <p>10 <b>There was very little within the site itself that</b></p> <p>11 <b>they could do other than evacuate the site if that</b></p> <p>12 <b>threat was taken seriously. But it was one of those</b></p> <p>13 <b>issues where the management team needed to be in</b></p> <p>14 <b>constant -- in liaison with the Gendarmes, with their</b></p> <p>15 <b>own management team to make some executive decisions</b></p> <p>16 <b>quite quickly and that would involve either a very</b></p> <p>17 <b>strong military presence or indeed evacuate the site.</b></p> <p>18 MS DOLAN: Thank you. I have nothing more to ask.</p> <p>19 Questions from MR RITCHIE</p> <p>20 MR RITCHIE: May it please you, sir. Mr Braziel, Andrew</p> <p>21 Ritchie for the family of Carlos Estrada. Good morning.</p> <p>22 You mentioned more secure living accommodation?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. So in effect, as I understand your opinion, it is that</p> <p>25 it is more practical to make the accommodation more like</p> <p style="text-align: center;">Page 25</p>	<p>1 identified properly on the risk, hasn't it?</p> <p>2 <b>A. It achieves nothing.</b></p> <p>3 Q. Thank you. Can I come to the Quick Reaction Force?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. You summarised in your report what Mr Fitzpatrick had</p> <p>6 already written in his witness statement?</p> <p>7 <b>A. Mmm.</b></p> <p>8 Q. That to his knowledge it was 10 to 12 personnel who</p> <p>9 should be able to deploy in about 10 minutes?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. With no armed men guarding the BdV expat security rested</p> <p>12 upon the Quick Reaction Force getting to the residential</p> <p>13 accommodation before armed terrorists, didn't it?</p> <p>14 <b>A. Quite so.</b></p> <p>15 Q. May we look then at the main alert mechanisms for the</p> <p>16 Quick Reaction Force?</p> <p>17 <b>A. Mmm.</b></p> <p>18 Q. One, we could foresee La Reculee ringing in to say</p> <p>19 "they've just turned off the highway, it is good of them</p> <p>20 to come through our post and will you please help out"?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. Two, the VCPs, numbers 1 and number 2, have seen</p> <p>23 something odd going out there nearby and ring in to say</p> <p>24 "there's something odd going on out here alert the Quick</p> <p>25 Reaction Force"?</p> <p style="text-align: center;">Page 27</p>
<p>1 a safe haven than to create a big safe haven?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. And you mention strong doors?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. And bars on windows?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. So if any expats are to hide they would hide in a place</p> <p>8 that would take the terrorists longer to get into?</p> <p>9 <b>A. Quite so.</b></p> <p>10 Q. And thereby gain time and protection from being taken</p> <p>11 hostage?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Thank you. Turning to your evidence about the risk</p> <p>14 assessment. You are advising that lumping risks</p> <p>15 together waters down the risk of terrorist attack on the</p> <p>16 final figure?</p> <p>17 <b>A. Or indeed any other risk if you start lumping them</b></p> <p>18 <b>together but in this particular instance, yes, quite so.</b></p> <p>19 Q. So if you take what the JV identified as the main risk,</p> <p>20 terrorist attack, and you add it to this risk, a SAM</p> <p>21 missile being fired at an aircraft and falling on to the</p> <p>22 CPF, impact enormous, probability tiddly widdly, and</p> <p>23 lump them together you are going to come out with a low?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. It is pointless lumping stuff together. It has to be</p> <p style="text-align: center;">Page 26</p>	<p>1 <b>A. Yes.</b></p> <p>2 Q. And three, the night patrols, if any, see something that</p> <p>3 they don't expect and ring in?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. Would you agree that they're probably the main methods</p> <p>6 of alerting the Quick Reaction Force unless of course</p> <p>7 somebody gets to the gates and then there is a guard at</p> <p>8 the gates?</p> <p>9 <b>A. Yes, that would be your last option, yes.</b></p> <p>10 Q. So assuming the terrorists are not stupid enough to go</p> <p>11 through La Reculee, we can discount La Reculee, can't</p> <p>12 we?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. Once the terrorists get to VCP1 and VCP2 they are within</p> <p>15 a kilometre of the front entrance to BdV, aren't they?</p> <p>16 <b>A. Yes, they are.</b></p> <p>17 Q. And even my maths can work out it doesn't take ten</p> <p>18 minutes to travel a kilometre in a 4x4?</p> <p>19 <b>A. No.</b></p> <p>20 Q. It is too late, isn't it?</p> <p>21 <b>A. It is.</b></p> <p>22 Q. So the effectiveness of the Quick Reaction Force depends</p> <p>23 to a large extent on the quality of the patrolling of</p> <p>24 the more distant field, does it not?</p> <p>25 <b>A. Yes, I would agree with that.</b></p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

1 Q. You write in your report that you have not been provided  
 2 with any evidence that the patrols were ever tested by  
 3 the JV. Have you since seen any evidence that the  
 4 patrols were tested?  
 5 **A. No.**  
 6 Q. You are aware, I imagine, from reading the transcript  
 7 that BP have wisely introduced an electronic device  
 8 called DriveRight. I don't know if that came to your  
 9 attention?  
 10 **A. No, I didn't read that I am afraid.**  
 11 Q. But it is apparently in all JV vehicles and it records  
 12 how far they have gone?  
 13 **A. Oh right, okay.**  
 14 Q. So were they minded to do so the DriveRight printouts  
 15 that they got could have told them how far each of the  
 16 JV vehicles went on night patrol?  
 17 **A. Quite so.**  
 18 Q. Would it perhaps have been a wise thing for them to have  
 19 a little look at that information that was available to  
 20 them?  
 21 **A. I would have thought that would be a useful tool to aid**  
 22 **them.**  
 23 Q. Unfortunately that has not been made available to Her  
 24 Majesty's Coroner or to you.  
 25 **A. No.**

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1 Q. There we are. Have you been provided with any evidence  
 2 that the Quick Reaction Force were prepared for  
 3 a simultaneous attack at point A and point B?  
 4 **A. None whatsoever. In fact, other than the knowledge that**  
 5 **a Quick Reaction Force was there that is the limit of my**  
 6 **knowledge of them.**  
 7 Q. You will have seen from Mark Cobb's evidence he was  
 8 wholly unaware despite being general manager and then  
 9 deputy general manager of the existence of this force  
 10 until the November of 2012 when through a conversation  
 11 it became apparent to him?  
 12 **A. Yes, I did read that.**  
 13 Q. May I ask you next about patrols and the heading is  
 14 "When and Where". You say in your report at page 25  
 15 that the area immediately around the facility should  
 16 have been patrolled by Gendarmes?  
 17 **A. Yes.**  
 18 Q. And that speaks for itself, doesn't it?  
 19 **A. Yes and by that I mean close.**  
 20 Q. Close?  
 21 **A. Yes.**  
 22 Q. Now, I am going to come to a zone patrol document very  
 23 quickly, it has been seen by other witnesses, but may  
 24 I put it before you. It is in your green bundle to your  
 25 right at tab 22.

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1 **A. Tab number again, please?**  
 2 Q. Tab 22. For the purposes of this I am going to invite  
 3 you to multi-task, which for me is quite difficult which  
 4 is why I have a junior, could you take the C24 plan  
 5 which is an overhead photograph and hold it up a bit.  
 6 I am very grateful.  
 7 Now this has on it some stickers put it on by  
 8 Mr Cobb that shows zone 1 is the zone between the BdV  
 9 and the CPF?  
 10 **A. Yes.**  
 11 Q. Do you see that one?  
 12 **A. Yes.**  
 13 Q. Zone 2 goes off to the east a bit along the trunk line  
 14 which is represented here by -- well it's not actually  
 15 represented by this black thing but it is approximately  
 16 where that black road is going. We have seen various  
 17 plans to show that?  
 18 **A. Yes.**  
 19 Q. And zone 2 goes up to a manifold somewhere along there,  
 20 trunk line 5, and then trunk line 5 zips further along  
 21 to the east?  
 22 **A. Yes.**  
 23 Q. Zone 3 drops down below the falaise and zone 4 is over  
 24 to the west a little bit more. So zone 1, zone 2,  
 25 zone 3 and zone 4 and just for the families, zone 1,

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1 zone 2, zone 3, zone 4. (Indicated)  
 2 Now, this zone patrol document sets out clearly  
 3 where in each of these zones you need an escort --  
 4 **A. Yes.**  
 5 Q. -- and you don't need an escort?  
 6 **A. Yes.**  
 7 Q. And it also sets out clearly in plain words that in  
 8 certain areas there are no military patrols. So, for  
 9 instance, if I could take you to the third internal page  
 10 of the zone patrol document, this is the multi-tasking  
 11 bit, page 237 of the core bundle, it says at the top  
 12 under "Revision date":  
 13 "Zone 3 is not a military patrolled area during  
 14 operating hours."  
 15 That is basically daylight hours if you don't mind  
 16 me putting it?  
 17 **A. Yes.**  
 18 Q. The same for zone 4. The same for zone 2 to the right  
 19 of the manifold. So in daylight hours no military  
 20 patrols, you need an escort?  
 21 **A. Yes.**  
 22 Q. I asked Mark Cobb whether he knew it was military  
 23 patrolled at night when there is potentially nobody  
 24 around and he didn't know but Mr Fitzpatrick told Her  
 25 Majesty's Coroner that these areas are not patrolled at

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<p>1 night. I need to make that premise clear before I ask 2 the next question so that it's plain to you.</p> <p>3 So, Mr Braziel, Her Majesty's Coroner has heard 4 zone 1 is patrolled at night and the other zones are 5 not, in broad terms?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. And zone 1 is a couple of kilometres either side of the 8 site, is that correct?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. Is that in effect your close zone that you have 11 described?</p> <p>12 <b>A. No, I would have expected them to actually be closer 13 than 2-kilometres to the site.</b></p> <p>14 Q. Can I come to the number of vehicles patrolling then. 15 We have done the when and the where. Mr Fitzpatrick 16 told Her Majesty's Coroner that five JV vehicles and 17 drivers were supplied for the night patrols in zone 1. 18 He thought it likely that they patrolled together but he 19 wasn't sure. He said in answer to my questions: it's 20 likely they patrolled together for their own security. 21 In answer to Mr Popat's questions he didn't know.</p> <p>22 <b>A. Right.</b></p> <p>23 Q. Gary Rose told Her Majesty's Coroner he slept in the CPF 24 at the -- forgive me, a building to the east side?</p> <p>25 <b>A. Yes, indeed.</b></p> <p style="text-align: center;">Page 33</p>	<p>1 <b>covering more ground and you are providing a more random 2 patrol.</b></p> <p>3 Q. The last thing you want is for some terrorist to come 4 up, wait with their lights off and see there go the 5 ducks we can just nip in there?</p> <p>6 <b>A. Indeed and particularly if that was their routine anyway 7 because if it was regularly that they did that then, 8 precisely.</b></p> <p>9 Q. Is it a basic principle of patrol that you don't always 10 do the patrol at the same time?</p> <p>11 <b>A. Absolutely right. Nor in the same area at the same 12 time.</b></p> <p>13 Q. Can I then come on number of vehicles to a further 14 point. Her Majesty's Coroner has heard from 15 Mr Fitzpatrick that during the drivers strike, June 16 to December, the JV couldn't supply the vehicles and the 17 drivers because they were on strike?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. So then those expats who were still at site, many of 20 them had moved out, but essential personnel were still 21 there, would not have had the benefit of Gendarmes 22 patrolling in JV vehicles and they would have to hope 23 that the Gendarmes used their own vehicles?</p> <p>24 <b>A. That was my understanding. I believe in some evidence, 25 it may have been Mr Fitzpatrick, that I think in fact</b></p> <p style="text-align: center;">Page 35</p>
<p>1 Q. And at night he would sit on a bench and watch them 2 going past on a track usually four or five in a row.</p> <p>3 <b>A. Right.</b></p> <p>4 Q. That has been described as the ducks in the row 5 patrolling, if you understand the description?</p> <p>6 <b>A. I do.</b></p> <p>7 Q. Zone 1 we are told by Mr Fitzpatrick was 2 to 8 3 kilometres either side of the road. Are you with me?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. And the road is about 3 kilometres long. So at its 11 length you have 3 plus another 3 at the top and 3 at the 12 bottom, 9-kilometres?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. And with maybe 6 kilometres. So 54 square kilometres is 15 your area for zone 1. It may be less or may be more but 16 given a rough --</p> <p>17 <b>A. Of that --</b></p> <p>18 Q. Is five vehicles going to be completely effective to 19 patrol so that no terrorist gets through?</p> <p>20 <b>A. I'm very surprised if five vehicles were patrolling 21 together. That is a degree of inefficiency of resources 22 to me. Within my sphere of knowledge and when I've had 23 my people patrolling and I'm going back to my military 24 days I would have expected two vehicles to patrol 25 together and in different areas, so you're actually</b></p> <p style="text-align: center;">Page 34</p>	<p>1 <b>they reverted to using their own.</b></p> <p>2 Q. Their own vehicles?</p> <p>3 <b>A. Their own vehicles.</b></p> <p>4 Q. And we have heard from other witnesses that they weren't 5 very good drivers, there were lots of crashes and that 6 is why the JV provided drivers and vehicles?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. Is it satisfactory for those expats who were still on 9 site, the attack didn't happen in that period, to have 10 to fall back on that method of patrolling rather than 11 the standard which is JV vehicles and drivers?</p> <p>12 <b>A. Its would appear that you are degrading the level of 13 service you are providing or the level of security you 14 are providing.</b></p> <p>15 Q. Now, at page 30 of your report you make four key 16 comments on patrols. So you may wish to turn that up. 17 I don't wish to summarise them inaccurately but I hope 18 I will get the summary right. Page 30 of your report. 19 You say:</p> <p>20 "The liaison team should have been aware of the 21 patrol frequency."</p> <p>22 And it is clear from Mr Fitzpatrick, the OLS on 23 site, the longest standing OLS that he was and he has 24 given evidence to Her Majesty's Coroner about that. 25 Secondly, you say:</p> <p style="text-align: center;">Page 36</p>

1 "The outer protection was an essential element of  
 2 defence in-depth."  
 3 **A. Quite so.**  
 4 Q. And that seems to accord with your onion principle that  
 5 you have espoused this morning. Thirdly you say  
 6 continuous patrolling should have been considered the  
 7 norm?  
 8 **A. Oh yes, yes, it's not an occasional activity. In this**  
 9 **sort of environment and with the number of teams you**  
 10 **have they should have been out regularly.**  
 11 Q. And fourthly you say, these are your words "without  
 12 these patrols the whole complex becomes vulnerable to  
 13 external infiltration from across the exposed desert."  
 14 Do you stick to that opinion today?  
 15 **A. Oh indeed.**  
 16 Q. So may I ask you these four questions: should the whole  
 17 site zone, 20-kilometres, the wider desert, have been  
 18 patrolled at night as well as zone 1?  
 19 **A. Yes, of course.**  
 20 Q. Secondly, we are going back to Pi R squared here, I'm  
 21 sorry, radius, 20-kilometres, circle, Pi R squared, the  
 22 radius is 20, R squared the 400, Pi is about 3. So  
 23 I have got 1,200 square kilometres is this zone that  
 24 Statoil described as the site zone?  
 25 **A. Yes.**

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1 Q. Are five vehicles patrolling there sufficient to patrol  
 2 1,200 square kilometres?  
 3 **A. No, certainly not.**  
 4 Q. Do you need to be a security expert to work that out?  
 5 **A. I wouldn't have thought so.**  
 6 Q. Could any patrol system have been regarded in a security  
 7 review as a 100 per cent effective?  
 8 **A. You can never be 100 per cent effective I. That would**  
 9 **be unkind. I think given the resources that were made**  
 10 **available to them they probably should have brought**  
 11 **their night patrol closer to what they were trying to**  
 12 **protect rather than going further out, so your thousand**  
 13 **square kilometres is too large an area. You need to**  
 14 **bring that ring in to provide you better protection of**  
 15 **what it is you are trying to protect. You're trying to**  
 16 **protect your staff for that reason.**  
 17 Q. Let us go back to our photo just because the family can  
 18 see it. Would you position, with nightvision goggles,  
 19 various vehicles around the BdV and the CPF at certain  
 20 number of kilometres out looking as well as having  
 21 people moving around patrolling, what would you do?  
 22 **A. Looking at this at the moment I would have had at least**  
 23 **one patrol area being round the BdV, I would certainly**  
 24 **have had a patrol area around the CPF and I'd probably**  
 25 **have had a third patrol operating in the dead zone**

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1 **between.**  
 2 Q. And each of those at least two cars?  
 3 **A. Yes.**  
 4 Q. That patrol of course had it been in existence that  
 5 night you would have expected to be able to get to the  
 6 front gate of the BdV within a couple of minutes because  
 7 it would have been patrolling around the BdV?  
 8 **A. Indeed.**  
 9 Q. It took 28-minutes for any Gendarmes to turn up at the  
 10 bus.  
 11 **A. Yes.**  
 12 Q. What is the logical conclusion for where the patrol was  
 13 then?  
 14 **A. I suspect it was either nowhere near or they were all**  
 15 **still in their barracks.**  
 16 Q. Border security, you have been asked by Ms Dolan about  
 17 that. Can I just confirm a few facts. No electronic  
 18 surveillance in place?  
 19 **A. No.**  
 20 Q. No drones?  
 21 **A. No.**  
 22 Q. There were also no drones at the site. Now, information  
 23 has come to our attention that drones aren't that  
 24 expensive. Do you know the cost of a drone?  
 25 **A. No, I don't.**

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1 Q. It is a long border you have said. There were no secure  
 2 police on the other side in Libya?  
 3 **A. No.**  
 4 Q. It was move as you like. And you have personal  
 5 experience, as I understand it, from your report, of  
 6 driving 4 by 4s in Libya and Algeria across desert?  
 7 **A. Indeed.**  
 8 Q. And Mr Fitzpatrick made it absolutely clear to Her  
 9 Majesty's Coroner that you could approach from almost  
 10 all points of the compass?  
 11 **A. Virtually, yes. There will be areas you can't but in**  
 12 **the main, yes.**  
 13 Q. So the correct presumption or assumption for those  
 14 planning security at In Amenas, 60-kilometres or so from  
 15 the border, should be the border may be porous, should  
 16 it?  
 17 **A. Yes.**  
 18 Q. Security at the site. All senior management witnesses  
 19 have told Her Majesty's Coroner that the security was  
 20 not designed to prevent an attack by men with 4 by 4s,  
 21 bombs and guns, but they have also added "on this  
 22 scale"?  
 23 **A. Yes.**  
 24 Q. When I have asked them the questions they have generally  
 25 brought that down to: well even if two men with guns and

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<p>1 a bomb in a car turned up at the door it wasn't designed 2 to prevent an attack. Is that an unfair question to 3 ask?</p> <p>4 <b>A. No it is not. Clearly they had done some actions to 5 prevent a small scale attack on the site by putting the 6 T bar concrete barriers around because they foresaw that 7 opportunity of possibly a suicide bomber or the like 8 ramming the fence and doing that. So from a small scale 9 attack they had perceived that that was possible and 10 again, by putting chicanes on the main road there was 11 clearly a perceived threat of someone driving from that 12 way. So, yes, you are quite right, that -- the fact 13 they had not considered a full scale attack of that sort 14 meant that they didn't have defence to protect against 15 that.</b></p> <p>16 Q. It is odd to work this out, isn't it? Because their 17 documents set that attack out?</p> <p>18 <b>A. Yes. They clearly do.</b></p> <p>19 Q. The documents talk about a camouflaged attack. That is 20 not the lad in town who has been turned into a Jihadi 21 and is in his old Honda. They actually say 22 a camouflaged attack in their own documents. Yet that 23 doesn't seem to have gone up to senior management and 24 been computed, does it?</p> <p>25 <b>A. No, and I think that takes us back to the risk</b> Page 41</p>	<p>1 Q. And this in effect permitted the terrorists so long as 2 they got their timing right to drive straight through 3 the outer door?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. You have seen those photos of the concrete posts, they 6 took a bit of a risk driving straight over those 7 concrete posts but they managed it?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. And then there is that car with the oil leaking out of 10 the radiator in and it crashed through the secondary 11 gate. Some additional photos we have been given 12 recently show the bus being parked across the secondary 13 gate. I don't know whether you have seen that?</p> <p>14 <b>A. I haven't seen that.</b></p> <p>15 Q. This may be too difficult for our technical expert to 16 pull up. Let me see if I can ... the very recent ones. 17 It is these stills from the video, particularly there is 18 a still with no faces in it but with the bus parked 19 across the entrance. So if I pass that one up. 20 (Handed) It will come up on screen because our 21 technical experts will search for it but may I pass to 22 you what we are informed is a printout from 23 16 January 2013, so the day of the attack?</p> <p>24 <b>A. I have it now (Handed).</b></p> <p>25 Q. An iPhone video if you will from somebody standing near Page 43</p>
<p>1 <b>assessment question that I was asked earlier, that there 2 was intelligence and there was changes in intelligence 3 throughout all this period. But they haven't sat down, 4 reworked the calculations and then gone to management 5 and said: these calculations have changed. What I have 6 seen nothing of in any documentation I have seen is where 7 the management team have actually agreed with or not 8 agreed with the documentation because it is not recorded. 9 There are no minutes of meetings where this 10 is discussed or the like.</b></p> <p>11 Q. No, and those members of the JOC, Statoil and the BP 12 members of the JOC with this documentation coming before 13 them six months, the security management plan, don't seem 14 to have said: "oh it says risk of terrorist attack 15 with international terrorists. What shall we do about 16 it?"</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. The gates, the external parking. You have explained 19 very clearly how the point of external parking is to 20 keep everything out so that you can keep the doors shut?</p> <p>21 <b>A. Quite so.</b></p> <p>22 Q. So only the chap delivering the food who has to get into 23 the canteen gets through barrier one in the secure zone 24 and then through barrier two?</p> <p>25 <b>A. Yes.</b> Page 42</p>	<p>1 the place where the vehicle that crashed through the 2 gates ended up, that is to left of camera, you can just 3 see the back of it. There is another vehicle that the 4 terrorists are loading stuff into, guns and stuff, but 5 you see the bus parked across the inner entrance there?</p> <p>6 <b>A. Yes, I do.</b></p> <p>7 Q. So what they did in effect is take advantage of the open 8 gate policy, expressly set in writing, open gates, 5.45 9 for whatever?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. Is that satisfactory from the point of view of security 12 against men in vehicles with guns or bombs?</p> <p>13 <b>A. No. It's -- it goes completely against the idea of 14 having a secure perimeter by leaving the gates open.</b></p> <p>15 Q. I am going to turn to a bundle of disclosure given 16 kindly by Mr Johnston which I think went into point 0 of 17 core bundle 5 if my recollection is correct.</p> <p>18 <b>THE CORONER:</b> Is this the July 2012?</p> <p>19 <b>MR RITCHIE:</b> Yes, I was hoping to find the JOC decision 20 which I believe is in there at 16. So it 21 starts December 2006 and then runs through to MOC 201 22 and it is a 60 page document. Has that been handed to 23 you?</p> <p>24 <b>A. No, I have got something else.</b></p> <p>25 Q. Or do you have the first page of that? Then I have Page 44</p>

<p>1 identified the wrong bundle. It is Gary Butt's bundle 2 that went into zero. Forgive me. This I only have at 3 the top of the Johnston disclosure with the JOC minutes 4 and MOC 201, I am afraid I don't know the reference to 5 it. So it was the bundle relating to ordering security 6 gates and exterior car parks. I relied on an email at 7 page 30 and my friend Mr Popat went through the various 8 pages including the JOC decision.</p> <p>9 MR POPAT: If it would help we have a spare bundle of the 10 same.</p> <p>11 MR RITCHIE: Fantastic. That is very helpful, indeed, 12 Mr Popat. That still leaves everybody else to find it 13 though. (Handed)</p> <p>14 Sir, have I given you enough time to find that?</p> <p>15 THE CORONER: I have it. It goes to 60 pages?</p> <p>16 MR RITCHIE: I am going to call it the 60 page bundle for 17 the moment.</p> <p>18 In that one there was a recommendation that Mr 19 Fitzpatrick says liaison made which is external 20 parking for all sites and then there is a JOC decision 21 and I would like to take you to the JOC decision if 22 I may. It is at pages 16 and 17 and the relevant bit is 23 on 17. But we should start on 16 to identify the date. 24 So if you turn to 16.</p> <p>25 <b>A. I have it.</b></p> <p style="text-align: center;">Page 45</p>	<p>1 <b>if you are going to have external parking external means</b> 2 <b>outside the outer fence.</b></p> <p>3 Q. Thank you. Now, I will come to what Mr Jeff Yates told 4 Her Majesty's Coroner and that is In Salah, the brother 5 facility, the advice was accepted, external parking was 6 created, so these gates were almost always closed?</p> <p>7 <b>A. Yes, I would expect that.</b></p> <p>8 Q. Does that meet the objective that you have described of 9 external parking?</p> <p>10 <b>A. Yes, it does.</b></p> <p>11 Q. I am not going to go through the tracking documents, but 12 I am going to summarise four of the physical security 13 measures that you yourself will have read about in the 14 security management plan.</p> <p>15 <b>A. Okay.</b></p> <p>16 Q. Concrete sills on perimeter fences which I think it was 17 Mr Butt said were to stop men getting underneath. 18 Secondly, concrete anti-ram barriers, T bars, around the 19 whole of the BdV and the CPF, to stop ram raiders?</p> <p>20 <b>A. Right.</b></p> <p>21 Q. Thirdly, a security alarm at CPF so that people didn't 22 run to the muster point when there were men with guns 23 coming into the facility. Fourthly, turnstiles, 24 electronic turnstiles for pedestrian entrances at BdV 25 and the CPF so that it wasn't, so there wasn't a left</p> <p style="text-align: center;">Page 47</p>
<p>1 Q. So that is 11 January 2007. Are you with me?</p> <p>2 <b>A. Yes, I'm with you.</b></p> <p>3 Q. Then if you turn to 17. So there is a decision on the 4 back end of something at the top and then the second 5 paragraph, chicanes approved, and it is the third 6 paragraph I wish to read to you:</p> <p>7 "Parking. Recommendation is that vehicle parking be 8 outside the access point of control. BdV parking 9 satisfies this requirement but solutions have to be 10 found for company camp and IBO."</p> <p>11 Is that a proper understanding of the exterior 12 parking security advice that Mr Fitzpatrick was putting 13 across that you need external parking so that you have 14 your primary gate, a security zone and an internal gate, 15 or is this a misunderstanding of that or you don't want 16 to comment on it?</p> <p>17 <b>A. This sounds confused.</b></p> <p>18 Q. You see they seem to be taking the access point of 19 control as the internal gate?</p> <p>20 <b>A. Quite so.</b></p> <p>21 Q. You drive in, everything's fine and dandy, you get out. 22 You walk up to the pedestrian gate and that's the access 23 point of control and you say, "look, I have no guns" so 24 you are let in?</p> <p>25 <b>A. No, that's not how it should be. The external parking,</b></p> <p style="text-align: center;">Page 46</p>	<p>1 open gate or a man with a lock or whatever.</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. None of these were put in?</p> <p>4 <b>A. That's correct.</b></p> <p>5 Q. Was that satisfactory from a security point of view?</p> <p>6 <b>A. No, certainly not.</b></p> <p>7 Q. Is that evidence that the management was complacent to 8 the risk?</p> <p>9 <b>A. I would have said so. If I'd have been in that position</b> 10 <b>there I'd have been very unhappy that having agreed that</b> 11 <b>those were required that they were not actually</b> 12 <b>installed quite properly.</b></p> <p>13 Q. May I turn to Gendarmes at BdV entrances. Initially we 14 have been told that the army were in BdV, had a little 15 camp there when it was being built and for a little bit 16 afterwards and then the Gendarmes were installed and the 17 army left because the Gendarmes had their camp built for 18 them.</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. Mr Fitzpatrick recommended from 2008, when the Gendarmes 21 took over as far as we are aware, forwards, told Her 22 Majesty's Coroner in answer to Her Majesty's Coroner's 23 question that he continued to recommend Gendarmes in 24 guards towers, it might be said in brackets with 25 decreasing volume as the years went on but that is my</p> <p style="text-align: center;">Page 48</p>

<p>1 comment?</p> <p>2 <b>A. Right.</b></p> <p>3 THE CORONER: Can you just tell me, just going back to what</p> <p>4 you said. Army in the BdV they have a camp while it is</p> <p>5 being built and for a little bit afterwards and then the</p> <p>6 Gendarme --</p> <p>7 MR RITCHIE: And then the Gendarmes would move into BdV from</p> <p>8 about 2008. That was Mr Fitzpatrick.</p> <p>9 THE CORONER: That was Mr Fitzpatrick, was it?</p> <p>10 MR RITCHIE: Yes. Then in answer to Her Majesty's Coroner's</p> <p>11 specific questions, you may have picked it up on the</p> <p>12 transcript, he wished it to continue and did continue to</p> <p>13 want Gendarmes in the guard towers but I have added</p> <p>14 "with decreasing volume" in other words --</p> <p>15 THE CORONER: I am so sorry, was the effect of his evidence</p> <p>16 was that one was simply a swap for the other?</p> <p>17 MR RITCHIE: Yes. And when the Gendarmes camp was built</p> <p>18 they moved into their camp and then the army filtered</p> <p>19 off.</p> <p>20 THE CORONER: Right.</p> <p>21 MR RITCHIE: By 2011 or 2012 did the security threat which</p> <p>22 the expat staff faced at the BdV warrant the JV asking</p> <p>23 for the Gendarmes to come back and man the guard towers</p> <p>24 in the day or in the night or both?</p> <p>25 <b>A. In my opinion, yes.</b></p> <p style="text-align: center;">Page 49</p>	<p>1 <b>A. Right.</b></p> <p>2 Q. The guard hut is in green, that is where the civil</p> <p>3 guards are and you see there is a metal pole, there is</p> <p>4 a sliding gate and that's as it was.</p> <p>5 <b>A. Mmm.</b></p> <p>6 Q. Where would you have put a Gendarme hut of sorts?</p> <p>7 <b>A. On the opposite side of the road to where the guards</b></p> <p>8 <b>are.</b></p> <p>9 Q. So where we have in green "guard hut" here you just put</p> <p>10 it the other side?</p> <p>11 <b>A. Yes.</b></p> <p>12 MR POPAT: Sorry, Mr Ritchie, I think you are both pointing</p> <p>13 to different -- there are two guard huts.</p> <p>14 MR RITCHIE: Forgive me, do that again.</p> <p>15 <b>A. Have I got the wrong plan?</b></p> <p>16 MR POPAT: No, there are two guard huts.</p> <p>17 <b>A. We are looking at this one here at the top, are we?</b></p> <p>18 MS DOLAN: Yes, that is the main entrance and then there is</p> <p>19 a secondary entrance with another guard hut.</p> <p>20 <b>A. So you have got ...</b></p> <p>21 Q. So you are putting it opposite the main entrance guard</p> <p>22 hut?</p> <p>23 <b>A. Traditionally you would do that. You would put it the</b></p> <p>24 <b>opposite side of where the actual guards are.</b></p> <p>25 THE CORONER: So it is opposite the two guard huts, it is</p> <p style="text-align: center;">Page 51</p>
<p>1 Q. At comparable sites, we have heard that Mark Cobb worked</p> <p>2 at REB, Rhoude El Baguel, which is 300 kilometres north,</p> <p>3 they had Gendarmes in a fortified hut of some sort, the</p> <p>4 other side of the civilian guards. So the civilian</p> <p>5 guards do all the work, check everything and so on, and</p> <p>6 the Gendarmes are there with their AK47s, occasionally</p> <p>7 letting them off so that a bullet hit the plaster work</p> <p>8 but otherwise there to guard against armed incursion.</p> <p>9 At Ohanet, 100 kilometres north of BdV, where two of</p> <p>10 the witnesses I think went on an excursion there were</p> <p>11 armed Gendarmes at the gates. I do not know what</p> <p>12 physical building they were standing in.</p> <p>13 <b>A. Right.</b></p> <p>14 Q. Should BP or the JV or Statoil have requested the</p> <p>15 Gendarmes to be at the gates of BdV by 2012?</p> <p>16 <b>A. Yes, indeed, I said so earlier, that there should have</b></p> <p>17 <b>been an armed presence of a Gendarme or Gendarmes at</b></p> <p>18 <b>each entrance.</b></p> <p>19 Q. Forgive me for turning my back on you when you were</p> <p>20 giving that answer. You have one of these which I think</p> <p>21 was called Estrada 1 when it was produced. So it is</p> <p>22 a blow up in effect of the front gates, this is the road</p> <p>23 from the VCP, the front gates, the car park and then the</p> <p>24 inner gate. This is the OLS office and I think that is</p> <p>25 the reception building or something.</p> <p style="text-align: center;">Page 50</p>	<p>1 the top one and opposite that one?</p> <p>2 <b>A. Yes.</b></p> <p>3 MR RITCHIE: Thank you. It is 5.47 in the morning, there is</p> <p>4 some shooting going on at the bus and there's a car</p> <p>5 coming towards the front entrance of BdV and it smashes</p> <p>6 into the first of the red and white poles and the guard</p> <p>7 is there with a gun. What is he going to do?</p> <p>8 <b>A. Shoot.</b></p> <p>9 Q. Get his AK47, four men, six men?</p> <p>10 <b>A. Quite so.</b></p> <p>11 Q. And then it hits the second pole. What's he going to be</p> <p>12 doing, he is going to be shooting isn't he, in all</p> <p>13 likelihood?</p> <p>14 <b>A. I would hope so.</b></p> <p>15 Q. That is his job, isn't it?</p> <p>16 <b>A. That is what he is there for.</b></p> <p>17 Q. Now of course there is always a risk that Gendarmes will</p> <p>18 run away but we have seen the Gendarmes fight pretty</p> <p>19 hard outside the bus to protect the lives of those in</p> <p>20 the bus and if there were two there in a sandbagged hut,</p> <p>21 you can't tell for sure what would happen, can you?</p> <p>22 <b>A. You can't tell for sure but experience tells me that</b></p> <p>23 <b>they would be able to hold off an armed assault for</b></p> <p>24 <b>a period of time undeterminable until such time as</b></p> <p>25 <b>reinforcements came.</b></p> <p style="text-align: center;">Page 52</p>

13 (Pages 49 to 52)

1 Q. And if you have proper patrols in the area which are  
 2 only a few minutes away you would hope that they would  
 3 turn up?  
 4 **A. Reinforcements would be there very quickly.**  
 5 Q. Causation, if I might turn to that. Four to five JV  
 6 vehicles with Gendarmes in them escort the bus from the  
 7 airport along the N3 and back?  
 8 **A. Yes.**  
 9 Q. And there has never been an attack on the N3 on the open  
 10 road. Secondly, 30 Gendarmes guard Rig T212 and the  
 11 other rig, Enafor 20, and we have heard evidence,  
 12 secondhand or thirdhand that some people with guns  
 13 turned up on the 16th, may have asked some questions and  
 14 then disappeared?  
 15 **A. Right.**  
 16 Q. That is wholly a matter for Her Majesty's Coroner how  
 17 that is interpreted but one interpretation is they  
 18 decided we are not going to challenge 30 Gendarmes, we  
 19 will go and find easy targets elsewhere?  
 20 **A. May well be.**  
 21 Q. And also the JV bus that left that morning with expats  
 22 in it was defended by Gendarmes to an extent that some  
 23 gave their lives to protect the expats, didn't they?  
 24 **A. Quite so.**  
 25 Q. So if there had been armed Gendarmes protecting the CPF

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1 or the BdV can you help Her Majesty's Coroner with  
 2 whether they would have made a difference at least to  
 3 save or protect some from being taken hostage?  
 4 **A. I would have expected that to be the case.**  
 5 Q. Instruction for security personnel. In the core bundle  
 6 is a document called "Instruction for security personnel  
 7 at the In Amenas site." Core bundle 1, tab 9. May  
 8 I invite you to look in your green bundle at tab 9.  
 9 Page 48 is the second page there. March 2009 is the  
 10 production date of this document and this is what  
 11 liaison were teaching their own -- that is not fair, not  
 12 their own -- guards that they were responsible for  
 13 training:  
 14 "The main threat against the IA base and its  
 15 employees is an attack by terrorist organisations. The  
 16 following methods of attack which could be used against  
 17 the site include a camouflaged incursion by armed  
 18 terrorists aiming to kill employees at the BdV, an entry  
 19 by terrorists in disguise under false pretences, forced  
 20 entry by armed terrorists."  
 21 Is it right that the only effective defence against  
 22 armed terrorists at the gates of BdV was to use armed  
 23 defending troops of some sort?  
 24 **A. Yes.**  
 25 MR RITCHIE: Thank you very much, Mr Braziel.

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1 Questions from MR OWEN-THOMAS  
 2 MR OWEN-THOMAS: Mr Braziel, my name is Owen-Thomas and  
 3 I ask questions on behalf of David Green, the father of  
 4 Stephen Green.  
 5 You have covered a great deal of what I wanted to  
 6 ask you but I do want to ask a few questions if I may.  
 7 Mr David Green has given evidence to this inquest that  
 8 he was very concerned at the start of January 2013 as to  
 9 the security situation because of the fall of Libya, the  
 10 military action in Mali and because of what his son told  
 11 him about the drivers strike on the site.  
 12 **A. Yes.**  
 13 Q. If you were asked to improve security at In Amenas as  
 14 a result of those heightened threats, what low cost,  
 15 easy security measures would you have recommended to  
 16 this JV?  
 17 **A. I'd have certainly improved the security at the gates.**  
 18 **Clearly that was the weakest link and by far one of**  
 19 **the -- the best deterrents of all was to get an armed**  
 20 **response around that site. So it meant someone talking**  
 21 **to the captain of the Gendarmes and encouraging him in**  
 22 **the first instance to improve his security presence on**  
 23 **site. And if liaison were doing their job that should**  
 24 **have been very possible.**  
 25 Q. Would you have recommended that the chicane gate be kept

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1 shut and locked?  
 2 **A. Of course.**  
 3 Q. Would you have recommended that the external parking  
 4 arrangement was put in place?  
 5 **A. Of course.**  
 6 Q. And you have already told us you would have advised that  
 7 the sliding gate be kept shut at all times?  
 8 **A. Yes.**  
 9 Q. In your evidence to Ms Dolan you mentioned Gendarmes in  
 10 sangars?  
 11 **A. Yes.**  
 12 Q. But again in answer to questions by Mr Ritchie you  
 13 wouldn't have said that anything as formal as a sangar  
 14 might have been necessary, a sandbag emplacement could  
 15 have done?  
 16 **A. Yes, a sangar can be a concrete structure, it can be**  
 17 **a sandbag placement in the short term. It's just**  
 18 **a means of offering some form of protection to the**  
 19 **soldier, the Gendarme, so that he can take cover.**  
 20 Q. Are you able to offer an opinion as to whether or not  
 21 the Gendarmes were sufficiently well disciplined to  
 22 operate a system of sangars and the degree of autonomy  
 23 that might be necessary for a soldier or a policemen in  
 24 a sangar?  
 25 **A. In their particular instance, no, because I have no real**

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1 **knowledge of what they were doing there. Certainly my**  
 2 **experience of Gendarmes in northern Algeria is that they**  
 3 **were very capable of operating and providing that sort**  
 4 **of level of protection.**  
 5 Q. Can I ask you a little bit more about that then. Is it  
 6 your understanding that the Gendarmes were well trained?  
 7 **A. Yes, they're a paramilitary force. They are**  
 8 **a combination of police and military effectively.**  
 9 Q. Well disciplined?  
 10 **A. Normally so, yes.**  
 11 Q. Is their equipment kept in good order?  
 12 **A. Again, I don't know about at that site but where I have**  
 13 **come across them elsewhere, yes.**  
 14 Q. Weapons kept zeroed?  
 15 **A. Whether they go to that extent I don't know. I'm not**  
 16 **competent to comment on the degree of live firing and**  
 17 **training that they received.**  
 18 Q. Are you able to offer an opinion on those matters as  
 19 regards the sort of terrorists who turned up at the site  
 20 at In Amenas?  
 21 **A. Yes.**  
 22 Q. Is your opinion is that they would have been well  
 23 trained?  
 24 **A. They would have probably been trained in the desert,**  
 25 **they would have certainly practised use of weapons.**

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1 **They would have formed a plan as to how they were going**  
 2 **to assault this facility. They wouldn't have gone in**  
 3 **blind I don't believe at all. So, yes, they would have**  
 4 **known what they were doing.**  
 5 Q. Would you consider that they had a comparable degree of  
 6 training and discipline as the Gendarmes?  
 7 **A. I would have said that they were disciplined in so much**  
 8 **as they were following a cause and --**  
 9 Q. But disciplined to strip down the rifle and clean it  
 10 every day?  
 11 **A. Probably not.**  
 12 Q. Disciplined enough to zero their weapons regularly?  
 13 **A. Probably not. They pick up a weapon and fire it.**  
 14 **I don't know enough about that particular incident.**  
 15 Q. Would it be right then to say that it wouldn't be your  
 16 opinion that you would need at least the same number of  
 17 Gendarmes against the same number of terrorists?  
 18 **A. No, I wouldn't have thought so. I would have thought**  
 19 **a small number of Gendarmes trained in tactics and**  
 20 **defence would have been able to hold them off for**  
 21 **a period of time.**  
 22 Q. Just thinking particularly about the drivers strike.  
 23 You have heard and read about the drivers strike. Does  
 24 that in your opinion, would that have given rise to  
 25 considerations of extra security just because of the

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1 unrest caused by the drivers strike?  
 2 **A. Yes, the fact that you've got unrest within the local**  
 3 **population would have caused me considerable concern.**  
 4 **And I have experienced it in other countries and**  
 5 **therefore you put extra measures in place because of**  
 6 **that.**  
 7 Q. What sort of measures might you have recommended?  
 8 **A. Again, I would have heightened the security. I would**  
 9 **have briefed the staff to be ready to react, to be more**  
 10 **observant, vigilant, see what was going on. We've**  
 11 **already seen the company did reduce the number of people**  
 12 **on site, whether that was for that reason or for**  
 13 **another, because of the practicalities. All of that,**  
 14 **and again, it would have been a question of -- you don't**  
 15 **have your own security team. You don't have a security**  
 16 **force of your own within the JV. So you have got to**  
 17 **rely on other people. So your reliance is on the**  
 18 **Gendarmes, so again, it's liaison with them to ask them**  
 19 **to increase the levels of security.**  
 20 Q. What would your advice have been if the Gendarmes had  
 21 said: no, we're not patrolling the perimeter?  
 22 **A. I would have taken -- well it's not my decision but as**  
 23 **a security person my advice to the management team would**  
 24 **have been: you need to reduce your number of people to**  
 25 **the barest minimum here.**

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1 **MR OWEN-THOMAS: Thank you, Mr Braziel. If I may just have**  
 2 **a moment. (Pause) Thank you, Mr Braziel.**  
 3 **Questions from MS GERRY**  
 4 MS GERRY: Mr Braziel, I represent the family of Sebastian  
 5 John. Just a few questions from me.  
 6 The perimeter fences, as you have described are  
 7 a weak point within the security of a site. It is  
 8 right, isn't it, that that was something that was  
 9 recognised by the JV. I don't intend to take you there,  
 10 but it's core bundle 1, tab 11 at page 96 in their  
 11 security management plan. They note:  
 12 "Gates would be the weakest link to a perimeter.  
 13 Vulnerable to vehicle ramming. Chicanes are the only  
 14 effective protection to this with security bumps."  
 15 I would assume you would agree with that?  
 16 **A. I do indeed.**  
 17 Q. And it is right is it not, in effect what happened at  
 18 the BdV is that whilst the outer gate was open it meant  
 19 that there was no effective chicane between the outer  
 20 gate and the inner gate so you there have a weak  
 21 perimeter fence without the protection of the chicanes?  
 22 **A. That's correct. It degraded the usefulness of the**  
 23 **chicane.**  
 24 Q. What we have heard from some witnesses is that there was  
 25 an assumption that because they're expecting a flow of

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1 traffic during the times when the gate would be open  
 2 that there was in effect no need for a chicane to be  
 3 protecting the perimeter fence in such circumstances.  
 4 What is your view on that?  
 5 **A. If you are going to have a chicane you need to -- the**  
 6 **chicane is there for the periods of time when you**  
 7 **haven't got a queue of traffic. So the fact that**  
 8 **occasionally you had long queues of traffic does not**  
 9 **alter the fact that you need a chicane on that entrance**  
 10 **to the site.**  
 11 Q. So reliance on the happenstance of queues of traffic in  
 12 your view was not sufficient to mitigate the risk?  
 13 **A. No, because that's only providing you a blockage,**  
 14 **a level of protection for a very short time and again,**  
 15 **at random. You don't know when.**  
 16 Q. You can't rely upon it in that way?  
 17 **A. No.**  
 18 Q. In respect to having an armed Gendarme 24 hours at VCP1  
 19 and VCP2, as you have suggested, in your report at  
 20 page 45, paragraph 4.6.2 you comment on the use of  
 21 civilian armed guards.  
 22 **A. Mmm.**  
 23 Q. And there you say you support the view that since there  
 24 were armed Gendarmes providing security at the site  
 25 there was no requirement for civilian security guards to

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1 be armed and then you say this:  
 2 "In any event it is unlikely that the presence of  
 3 a single armed security guard at the checkpoints would  
 4 have deterred a group of heavily armed terrorists from  
 5 attacking the facility."  
 6 Are you here making a distinction between a single  
 7 armed security guard and a member of the Gendarme?  
 8 **A. I certainly am. Maybe I didn't make that clear.**  
 9 Q. Can you just expand on why you make that difference?  
 10 **A. Yes. A Gendarme is a trained soldier effectively.**  
 11 **Whereas a security guard would probably have a weapon,**  
 12 **normally for personal protection more than anything**  
 13 **else, and is unlikely against an armed force to be seen**  
 14 **as a real problem. Whereas a soldier, a Gendarme, they**  
 15 **would see as a problem.**  
 16 Q. And this goes back into your principle of delay and  
 17 deter?  
 18 **A. Yes.**  
 19 Q. And in relation to that as I understand it, your  
 20 evidence is that there is not going to be one thing that  
 21 would or could have made the difference, it is  
 22 a combination of factors?  
 23 **A. Yes.**  
 24 Q. From my understanding of your evidence, that would be  
 25 use of armed guards at the VCP, the gates, no exterior

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1 parking, have substantial gates, keep the gates closed  
 2 and then the rooms being substantial, the walls, the  
 3 doors, so all those things taken together is the  
 4 layering you are describing?  
 5 **A. Yes, it is.**  
 6 Q. So it would be wrong, wouldn't it, to turn round and say  
 7 if one of these things had been different there would  
 8 have been a difference, what you are saying is there may  
 9 have been a difference had the number of things been  
 10 taken together?  
 11 **A. That's exactly what I have been saying.**  
 12 Q. From your evidence as well you said obviously it's not  
 13 possible to guarantee that you are going to prevent an  
 14 attack but what you do is you reduce the likelihood of  
 15 the attack taking place and if an attack takes place you  
 16 reduce the number of lives that are at risk by taking  
 17 those measures?  
 18 **A. Yes.**  
 19 Q. Following on from that and picking up on what you were  
 20 saying about the reduction of personnel during the  
 21 drivers strike period. We have heard evidence from some  
 22 witnesses that the view was taken that the site was safe  
 23 or not safe for expats to be there and there was no  
 24 consideration of the work that was being done by those  
 25 expats there as to whether they were essential or not.

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1 Can I ask you whether you think that in terms of  
 2 reducing exposure to risk that in your view is a flawed  
 3 approach and there should be some consideration given to  
 4 reducing the number of expats on site and the necessity  
 5 to have them there?  
 6 **A. Clearly so. And indeed, it is written into their**  
 7 **security plan that in a heightened security situation**  
 8 **they reduce the number of expats on site.**  
 9 Q. Because clearly the risk that is being identified over  
 10 again is the risk of kidnap and a risk of terror attack  
 11 and if I can use the phrase it's an attack against  
 12 western interests?  
 13 **A. Yes, it is.**  
 14 Q. And so a principle of reducing risk, both likelihood and  
 15 consequence, you reduce the exposure to risk by reducing  
 16 the number of expats on site?  
 17 **A. Quite so.**  
 18 Q. Can I then turn to the relevance of the changing  
 19 political situation in Algeria. Am I right that it  
 20 would be your view that the relevance of that was to  
 21 raise questions about the reliance placed on the  
 22 military and the assumptions made about the military's  
 23 ability to protect both the border and the military  
 24 zone? What I mean by that is what the intelligence was  
 25 showing was concern about the border area and the powers

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1 of the military to protect rather than necessarily  
 2 a specific threat against specifically oil production  
 3 areas and that type of threat?  
 4 **A. The deployment of the troops would have appeared to have**  
 5 **been in response to the deteriorating political**  
 6 **situation in the neighbouring countries and indeed**  
 7 **incursions across the border. So the Algerian military**  
 8 **deployed this 7,000 troops into southern Algeria across**  
 9 **a very, very wide area to do the best they can I assume.**  
 10 **I have not seen any evidence as to what they were**  
 11 **actually doing having deployed 7,000 troops down there.**  
 12 Q. But it is right, isn't it, that if it's the case, and it  
 13 is accepted, there was no specific increase of a threat  
 14 to a particular target, what the change in political  
 15 situation was doing was raising questions about the  
 16 ability of the military, to rely on the military in  
 17 order to protect In Amenas?  
 18 **A. Yes, the military were obviously now stretched further**  
 19 **and further and they were some, one assumes, some**  
 20 **distance away from the In Amenas site because if it was**  
 21 **the border area that was causing the problem they were**  
 22 **some 40-miles away from In Amenas. The fact also that**  
 23 **the Algerian government saw fit to deploy those troops**  
 24 **because of the deteriorating situation in my opinion**  
 25 **should have started raising questions within the**  
 Page 65

1 **In Amenas management that says there's clearly a problem**  
 2 **here.**  
 3 Q. This is the flip side, isn't it? There is one way you  
 4 can look at the deployment of troops as a reassuring  
 5 sign. The other way if you look at it, this is  
 6 a deteriorating situation?  
 7 **A. Yes.**  
 8 Q. What we have heard from, and I think it was Mr Johnston,  
 9 in evidence saying that the security risks emanating  
 10 from Libya were mitigated by extensive patrols  
 11 undertaken by the Algerian military. Do you agree that  
 12 that was a mitigating factor, the extensive border  
 13 patrols against risks emanating from Libya?  
 14 **A. It was a mitigating action. What we are not aware of is**  
 15 **how effective that mitigating action was.**  
 16 Q. The other evidence we have heard from witnesses is that  
 17 they were reassured by successful operations that were  
 18 being reported carried out by the military. Again,  
 19 what's your view on reliance on reports of successful  
 20 operations against terrorists?  
 21 **A. I'm sure there were a number of successful operations,**  
 22 **but it doesn't alter the fact that the fact that they**  
 23 **had to deal with these situations would suggest to me**  
 24 **that there was an increasing problem that needed dealing**  
 25 **with.**  
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1 Q. Would you agree that the risks emanating from the change  
 2 in political situation, Northern Mali and Libya, were  
 3 either known or knowable in the period before the attack  
 4 in January 2013?  
 5 **A. I think they were well documented and they were in the**  
 6 **documentation that was provided in the intelligence**  
 7 **reports produced for the JV or provided to the JV.**  
 8 Q. In relation to the weaknesses of the internal physical  
 9 security that you have highlighted in your report and in  
 10 your evidence were they weaknesses that were known or  
 11 knowable before January 2013?  
 12 **A. Yes, they were well documented.**  
 13 Q. So can I take it from that that the evidence you give  
 14 and the opinions you have given aren't based on  
 15 hindsight ie knowing what's happened since the event,  
 16 but are based on factors that could or should have been  
 17 known prior to January 2013?  
 18 **A. Yes, indeed, they are based, deliberately based on the**  
 19 **evidence I have read not what I think should or could**  
 20 **have happened in hindsight.**  
 21 MS GERRY: Thank you very much. I have no further  
 22 questions.  
 23 Questions from MR FLINN  
 24 MR FLINN: Good morning, Mr Braziel. My name is Matthew  
 25 Flinn. I ask questions on behalf of the families of  
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1 four men who died in these attacks. Mr Bilsland,  
 2 Mr Barlow, Mr Morgan, Mr Whiteside. A lot of the  
 3 questions have already been covered but a few of them  
 4 I would like to revisit briefly. Firstly, just  
 5 returning to the idea of the principles that should  
 6 guide security planning and implementation at a site  
 7 like In Amenas.  
 8 Starting first at the highest level of abstraction.  
 9 Would you agree that when you are making assumptions on  
 10 which you base your security measures you should take  
 11 a precautionary approach to those assumptions?  
 12 **A. Absolutely. Until you can verify those assumptions you**  
 13 **cannot rely on them.**  
 14 Q. And if there is a possible risk you should make an  
 15 assumption that that risk might manifest as opposed to  
 16 the assumption it probably won't, it will be fine?  
 17 **A. Yes. As a security professional I would certainly take**  
 18 **the view that it could probably happen, not that it's**  
 19 **unlikely to happen.**  
 20 Q. If we then take it down to a slightly more detailed  
 21 level. You have already given quite clear evidence this  
 22 morning that the assumption that the military would be  
 23 able to effectively protect the border and the military  
 24 zone, the hydrocarbon zone, could not be tested so it  
 25 was not an assumption which should have been made?  
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1 **A. No.**  
 2 Q. Mr Fulcher, whose evidence you will have read, said that  
 3 one of the starting assumptions of the Statoil  
 4 investigation team when they carried out their review  
 5 was in fact the opposite, that no military in the world  
 6 could guarantee to protect an area of that size. Would  
 7 you agree that that, the inverse assumption, was the  
 8 correct starting assumption?  
 9 **A. Yes, that is what I have written in my report, exactly**  
 10 **that and I have referred to the Statoil report and make**  
 11 **the point that I agree totally with them. We have**  
 12 **experience of it throughout the world, that you just**  
 13 **can't protect these areas.**  
 14 Q. And the wisdom of that assumption, that the military  
 15 couldn't guarantee that they'll be able to prevent  
 16 anyone reaching the site, was heightened in this case by  
 17 the fact that at the relevant time the military had not  
 18 provided the JV with any detailed information as to  
 19 their methods or capabilities in terms of protection of  
 20 those zones?  
 21 **A. Yes, and the fact that they haven't done so would cause**  
 22 **me some concern.**  
 23 Q. Does it follow from that that even when there are rings  
 24 of military protection a site such as In Amenas should  
 25 be designed and built to prevent access to armed

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1 attackers or at least delay their access?  
 2 **A. Yes, it should because what you don't know is how long**  
 3 **you're going to get that perceived military protection,**  
 4 **it could be that they have other priorities and abandon**  
 5 **the area to go somewhere else and then you're left**  
 6 **totally exposed.**  
 7 THE CORONER: You say it would cause you some concern.  
 8 Would you expect them to share their methods or  
 9 capabilities to some extent?  
 10 **A. I would have expected somewhere, sir, within -- if not**  
 11 **within the JV certainly within -- it would have been**  
 12 **possible to obtain some information if only by going up**  
 13 **through the embassy and the military advisers and**  
 14 **asking. But again, as Mr Fulcher said on Friday, people**  
 15 **in these positions tend to build relationships over**  
 16 **a period of time. There was a relationship I believe**  
 17 **with the senior military officer in In Amenas town, for**  
 18 **example, who's known to the JV. He was known to**  
 19 **liaison. So you would have expected people to be**  
 20 **engaging with these people to gather some information.**  
 21 THE CORONER: I am going to have a break at some point for  
 22 15-minutes. Would now be as good as point as any?  
 23 MR FLINN: Now would be as good as point as any, sir.  
 24 THE CORONER: Let us do that. Fifteen minutes.  
 25 (11.55 am)

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1 (A short break)  
 2 (12.10 pm)  
 3 MR FLINN: Mr Braziel, before we broke we went through some  
 4 of the assumptions. At the highest level make  
 5 precautionary assumptions. At one level below that the  
 6 first assumption we looked at is let us assume that the  
 7 military cannot guarantee that terrorists won't get  
 8 through the border and get through the desert  
 9 undetected?  
 10 **A. Right.**  
 11 Q. Moving on to another assumption. We have heard evidence  
 12 about the history of the style of attacks in Algeria  
 13 over the years preceding the attack with which we are  
 14 concerned. And there has been some evidence that an  
 15 attack of this scale involving as it did multiple  
 16 vehicles filled with armed men driving through the  
 17 desert was unthinkable. Sir, for your reference  
 18 Dr Claire Spencer said that page 172 of the transcript  
 19 for 20 October.  
 20 Mr Ritchie referred you to the training document for  
 21 guards and that specifically mentions as one of the  
 22 risks forced entry by armed terrorists. So there is  
 23 a question whether or not that risk was in fact thought  
 24 of or not.  
 25 But setting that to one side, it might well be that

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1 there had not been a large scale assault on a fixed gas  
 2 production facility before by a large group of armed  
 3 attackers, but in terms of the security planning  
 4 assumptions and the basis on which there should be  
 5 planning security would you agree that such  
 6 a possibility should not be discounted?  
 7 **A. Quite so. Even scaling the possibility of an attack the**  
 8 **pure thought that there could be an armed terrorist**  
 9 **attack on the In Amenas site should have been considered**  
 10 **and follow on from that then that the security planners**  
 11 **should then be considering the scaling of how that**  
 12 **attack might take place.**  
 13 Q. Yes, and in your own report you say at page 90 that  
 14 security plans must take into consideration the full  
 15 array of possible terrorist attacks such as the use of  
 16 insiders, suicide bombers, stand off attack or a vehicle  
 17 borne armed assault. And if you are dealing with the  
 18 full array of terrorist attacks that would include an  
 19 assault by a group of heavily armed attackers?  
 20 **A. Yes, it would.**  
 21 Q. So to summarise the position, when you are planning and  
 22 implementing security measures at a site like In Amenas  
 23 the assumptions that should form the basis of your  
 24 planning should include firstly, because the military  
 25 cannot guarantee that they'll intercept all terrorist

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1 activity it is possible that terrorists may reach the  
 2 facility?  
 3 **A. Quite so.**  
 4 Q. And secondly, if they do it is possible that they may  
 5 launch a high impact attack including the possibility of  
 6 a group of men launching an armed assault?  
 7 **A. Quite so.**  
 8 Q. Could we add a third assumption to that? Mr Fulcher  
 9 said in his oral evidence that the view of the Statoil  
 10 investigation team was that "anyone operating in an  
 11 environment such as In Amenas has to work on the  
 12 assumption that there are going to be insiders who will  
 13 report at a certain level what they see and what they  
 14 hear to potential ill wishers."  
 15 Sir, the reference for that is page 91, transcript  
 16 of 24 October.  
 17 Would you agree that that is a further assumption  
 18 that should be made when you are considering and  
 19 planning your own security measures?  
 20 **A. Yes, indeed and I make comment in my report which says**  
 21 **that although we are not certain, one can assume that**  
 22 **they did get some insider information or indeed they may**  
 23 **still be getting some insider information.**  
 24 Q. So it would follow from that that if you made a decision  
 25 to keep the gates to the facility open at busy times at  
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1 the same time you should be assuming that such  
 2 information is at risk of being passed on to those with  
 3 malevolent intent?  
 4 **A. Of course.**  
 5 Q. You have already expressed in response to questions from  
 6 others the measures that you would have in place, I  
 7 assume in light of those assumptions, and you mentioned  
 8 an armed presence at the gate?  
 9 **A. Yes.**  
 10 Q. Closed and locked chicanes?  
 11 **A. Yes.**  
 12 Q. A strong gate?  
 13 **A. Yes.**  
 14 Q. And external parking?  
 15 **A. Yes and external patrols.**  
 16 Q. And external patrols.  
 17 **A. Close external patrols.**  
 18 Q. I would like to move on to the topic of implementing  
 19 security measures and the principles applying to that.  
 20 Would you agree that where advice has been given to  
 21 the JOC of the JV that a certain security measure should  
 22 be implemented and that advice has been accepted, it is  
 23 common sense, isn't it, the matter should be implemented  
 24 as soon as possible?  
 25 **A. Of course.**  
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1 Q. Now, in 2012 there was a drivers strike which had the  
 2 potential to impact on the provision of JV drivers for  
 3 Gendarme patrols. There was the transfer of internal  
 4 security functions from liaison to SSI and we have heard  
 5 evidence there were some teething problems with that and  
 6 we have also heard at length evidence about the overall  
 7 deterioration in the broader region.  
 8 So all of those factors added an additional element  
 9 of urgency to implementing agreed measures?  
 10 **A. Yes.**  
 11 Q. Are you able to provide your professional opinion as to  
 12 a back stop in terms of timing? So, for example, where  
 13 a security measure has been recommended and accepted all  
 14 efforts should be made to achieve implementation within  
 15 X period of time?  
 16 **A. You have got to take into consideration a number of**  
 17 **factors there. The availability of the measure, funding**  
 18 **for that measure, the ability to actually get it to**  
 19 **southern Algeria, if it's a physical measure. I would**  
 20 **expect -- there tends to be in the world in which**  
 21 **I operate, certainly we used to do: what can you do now?**  
 22 **What can you do in a few months and what's going to take**  
 23 **you about a year? And so you actually prioritise what**  
 24 **is possible in the timescales and some things you can do**  
 25 **straight away and some things take just a little bit**  
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1 **longer but you monitor that throughout that period of**  
 2 **time.**  
 3 Q. For those things you can do straight away you should do  
 4 straight away?  
 5 **A. Absolutely.**  
 6 Q. Can you think of any circumstances in which a delay of  
 7 four to five years would be justified?  
 8 **A. Totally unjustifiable.**  
 9 Q. I would like to move on to a topic of security crisis  
 10 training. At page 84 of your report you say that you  
 11 had not seen evidence of any pre-deployment training  
 12 being given to expatriate staff. Now, a number of  
 13 witnesses have given evidence to the coroner that they  
 14 did not receive any training on security matters before  
 15 they deployed to the site and there was only the  
 16 induction once they arrived?  
 17 **A. Yes.**  
 18 Q. It is your view that workers deploying to regions in  
 19 facilities where there is a risk of terrorism should be  
 20 briefed on that risk before they deploy or is it  
 21 sufficient to brief them on arrival?  
 22 **A. No, I would have expected that people deploying to**  
 23 **regions of heightened risk should receive some form of**  
 24 **briefing before they actually leave the UK.**  
 25 Q. And what would you say the content of that briefing  
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1 should be?

2 **A. That's all to do with -- it starts at the top end with**

3 **the political overview, taking them down through what**

4 **the security measures, what they should expect when they**

5 **get to the airport, how they're going to be looked**

6 **after. The fact that they're going to be put in**

7 **a convoyed coach. There is going to be an armed**

8 **presence there which might be a surprise to some people,**

9 **all the way down to how they'll be looked after at the**

10 **site and what security measures are in place at the**

11 **site. So they have -- they themselves have an overview**

12 **and a comfort factor as to where they're going.**

13 Q. Let us turn briefly to the information that was provided

14 on arrival during the induction. If you take the green

15 bundle, core bundle 1. I think it is at tab 10 which

16 should be page 66. Do you have that?

17 **A. Yes, I have.**

18 Q. And if you turn to page 68 we can see a list of subjects

19 covered.

20 **A. Yes.**

21 Q. If you just take a moment to take a look at that list.

22 Are there any key subject areas from that list which

23 appear to you to be missing?

24 **A. Well, I suppose the covering under alarms I assume, what**

25 **to do in the event of a security alert and what to do in**

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1 **the event of a fire alert other than just covering the**

2 **alarm, so I would expect them to get some detailed**

3 **information of what to do in those sort of**

4 **circumstances.**

5 Q. I think if we turn to page 70 to be fair we can see --

6 **A. Yes, it does, yes.**

7 Q. -- there more detail about the security alarm and there

8 are instructions given there as to what to do. It is

9 the lock down procedure basically.

10 **A. Yes.**

11 Q. If we then turn back a page to page 69 we can see there

12 is some information headed "Ground and general" and it

13 looks to be some geographical information was provided?

14 **A. What's not here is what is the background information**

15 **that's actually being given to the back of these slides.**

16 **I am assuming that someone from the liaison team is**

17 **actually physically presenting this presentation to**

18 **a group of people so he will have notes and information**

19 **that actually puts the meat on to what's here.**

20 Q. Indeed. And it is important to be clear that we have

21 heard evidence that these slides were used as speaking

22 prompts for those giving the presentation. So it

23 doesn't represent a script and we can't say that it

24 represents the totality of the information that was

25 provided?

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1 **A. No.**

2 Q. But it does seem that, at least from the slides, there

3 doesn't seem to be a discussion of the nature of the

4 threats the site was facing such as a terrorist attack

5 and the way that threat might manifest?

6 **A. I would have assumed that would be covered under**

7 **security overview but without having the script and**

8 **knowing what was said I -- but I would expect that to be**

9 **included in that information.**

10 Q. Right. I think that answers my question. There is no

11 point speculating so we'll move on from that.

12 **A. Yes.**

13 Q. Thank you. You have already given evidence about the

14 importance of rehearsals for drills?

15 **A. Yes.**

16 Q. And that would cover both fire alarms and security

17 alarms?

18 **A. Mmm.**

19 Q. Is it important that drills take place regularly in

20 terms of responding to security alarms?

21 **A. Yes.**

22 Q. How regularly?

23 **A. I would have certainly thought -- as people were on, the**

24 **majority of people were on rotation I would expect there**

25 **to be a practice alarm probably at least once per**

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1 **rotation.**

2 Q. Presumably those drills would take place at different

3 times of day?

4 **A. Yes.**

5 Q. The result of that being that people can practice going

6 into lock down in a variety of different locations?

7 **A. Yes, depending whether they're at the CPF or whether**

8 **they're in the domestic accommodation or where so ever.**

9 Q. And it is important that they have that opportunity to

10 test it out?

11 **A. To practise it. To know what they're going to do.**

12 Q. Thank you very much. The last topic I just wanted to

13 touch with you briefly. Ms Dolan and Mr Ritchie I think

14 referred you to the various risk assessments that BP had

15 carried out. Could we just turn to page 184 of the

16 bundle, the same bundle you have, the green one?

17 **A. Yes.**

18 Q. This is an exhibit you saw before but it was in

19 a different place?

20 **A. Yes.**

21 Q. There was some discussion of the wisdom or lack thereof

22 of grouping together various manifestations of

23 a terrorist risk into one header?

24 **A. Yes.**

25 Q. And I think you commented that it shouldn't necessarily

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<p>1 include things like kidnapping under the same heading?</p> <p>2 <b>A. No, each potential threat should be assessed separately.</b></p> <p>3 Q. And to be fair to you it might be that page 184 goes on</p> <p>4 to further pages that we don't have in front of us. If</p> <p>5 you look to page 185 you can see there the JV liaison</p> <p>6 project 2012 risk assessment matrix?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. And we can see there that terrorism is the first line,</p> <p>9 political is the second line, and kidnap and ransom is</p> <p>10 the third line. So it might be that kidnap was dealt</p> <p>11 with separately but is it right that your point still</p> <p>12 stands: lumping together all sorts of the way in which</p> <p>13 a terrorist threat could manifest is not necessarily</p> <p>14 helpful?</p> <p>15 <b>A. No, it gives you a false matrix figure.</b></p> <p>16 Q. Certainly in terms of including pipeline security with</p> <p>17 a terrorist attack on the site?</p> <p>18 <b>A. Yes, it is a different threat.</b></p> <p>19 Q. I think if you look across to the risk comment column to</p> <p>20 pipeline security there are a number of bullet points,</p> <p>21 interruption to production. ROW, which I understand</p> <p>22 might be right of way, and then natural disaster.</p> <p>23 Natural disaster isn't a terrorist risk, is it?</p> <p>24 <b>A. No, no.</b></p> <p>25 Q. So that also has the possibility to mislead?</p> <p style="text-align: center;">Page 81</p>	<p>1 behalf of BP.</p> <p>2 Can I just begin by making sure I have understood</p> <p>3 your expertise in the area and specifically in this</p> <p>4 region, in this part of the world. I know you have done</p> <p>5 some work in the past on, I am not sure whether it is</p> <p>6 pipelines or facilities in the Lebanon, is that right?</p> <p>7 <b>A. Both.</b></p> <p>8 Q. Have you been responsible for providing security advice</p> <p>9 in the way that, for example, the liaison team were at</p> <p>10 this plant --</p> <p>11 <b>A. Yes, I have just done four plants in Saudi Arabia.</b></p> <p>12 Q. Yes, sorry, I haven't finished the question. It was</p> <p>13 before the incident, before the attack, providing that</p> <p>14 sort of advice at an oil and gas facility of this size</p> <p>15 and type in the desert in Algeria?</p> <p>16 <b>A. Not in Algeria, no.</b></p> <p>17 Q. But you have some experience of other environments such</p> <p>18 as the Lebanon and now you have mentioned Saudi Arabia?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. Thank you. Had you done any work in Algeria before?</p> <p>21 <b>A. Yes, I have worked with -- in Algiers itself.</b></p> <p>22 Q. And you mentioned in the course of some of your earlier</p> <p>23 answers some knowledge of Gendarmes in northern Algeria</p> <p>24 too?</p> <p>25 <b>A. Yes, I have liaised with Gendarmes in Algeria.</b></p> <p style="text-align: center;">Page 83</p>
<p>1 <b>A. Yes, there's a degree -- they've probably included some</b></p> <p>2 <b>of the non-security risks in here as well. But that</b></p> <p>3 <b>wouldn't be unusual.</b></p> <p>4 MR FLINN: Mr Braziel, those are all the questions I have.</p> <p>5 Thank you very much.</p> <p>6 Further questions from MR RITCHIE</p> <p>7 MR RITCHIE: May I just clarify something before my learned</p> <p>8 friend Mr Popat asks his questions.</p> <p>9 Mr Braziel, I misstated a question, may I correct</p> <p>10 it?</p> <p>11 <b>A. Sure.</b></p> <p>12 Q. In relation to causation, in relation to the attack on</p> <p>13 the bus I asked the question including within it the</p> <p>14 sentence that the Gendarmes gave their lives. Whereas</p> <p>15 there is evidence of blood in one of the Gendarme's</p> <p>16 vehicles and the witnesses, Gendarmes, saying blessé,</p> <p>17 which means injured, there is no evidence that any of</p> <p>18 them died.</p> <p>19 <b>A. Okay.</b></p> <p>20 Q. So I should have said risked their lives. I apologise</p> <p>21 for that. Does it change your answer?</p> <p>22 <b>A. No, it doesn't at all.</b></p> <p>23 MR RITCHIE: Thank you very much. I am very grateful.</p> <p>24 Questions from MR POPAT</p> <p>25 MR POPAT: Good afternoon, Mr Braziel. I ask questions on</p> <p style="text-align: center;">Page 82</p>	<p>1 Q. Mr Braziel, you have prepared and provided two reports</p> <p>2 for the inquest and you have provided a declaration</p> <p>3 which is in the standard form, or similar to the</p> <p>4 standard form, for experts?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. And you appreciate that your opinion evidence should be</p> <p>7 independent?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. Expert?</p> <p>10 <b>A. Mmm.</b></p> <p>11 Q. Balanced?</p> <p>12 <b>A. Mmm.</b></p> <p>13 Q. Fair?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. And not influenced, insofar as it is possible for anyone</p> <p>16 to do this, with hindsight?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. I just want to look at just one section of your report</p> <p>19 in this context, please. I am not sure that I have the</p> <p>20 same page numbering as everyone else because some of the</p> <p>21 references that were being given to you didn't correlate</p> <p>22 with my references so can I just try. Paragraph 4.8.2</p> <p>23 which I have at page 52. I can see a number of nods so</p> <p>24 it seems --</p> <p>25 THE CORONER: You should have just three lines of that at</p> <p style="text-align: center;">Page 84</p>

<p>1 the bottom of the page.</p> <p>2 MR POPAT: It begins with that and continues over the page,</p> <p>3 yes.</p> <p>4 So this is your report. This is your first report,</p> <p>5 of course, Mr Braziel.</p> <p>6 <b>A. Mmm.</b></p> <p>7 Q. And in it, having set out matters which precede this</p> <p>8 section which is marked "Opinion", which include</p> <p>9 reference to an independent newspaper report and other</p> <p>10 matters you say:</p> <p>11 "In my professional opinion the oversight and</p> <p>12 monitoring of the In Amenas site by the parent companies</p> <p>13 had become inadequate and resulted in poor security</p> <p>14 governance of the facility."</p> <p>15 What was the basis for setting out that opinion?</p> <p>16 <b>A. Based on what I'd read, all the evidence I'd read, the</b></p> <p>17 <b>various parts in this section and I would need to look</b></p> <p>18 <b>at what led to that -- bear with me.</b></p> <p>19 Q. If it helps you, I will take you back to the start of</p> <p>20 this section which is page 49.</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. There you set out something in the Statoil report which</p> <p>23 says:</p> <p>24 "The mechanisms for oversight and monitoring were</p> <p>25 provided through a combination of management</p> <p style="text-align: center;">Page 85</p>	<p>1 Q. I am sorry.</p> <p>2 <b>A. My opinion.</b></p> <p>3 Q. Your opinion, yes.</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. It is the basis for your opinion that I wanted to</p> <p>6 understand. You are aware, you have seen very large</p> <p>7 quantities of documents, you have now read through the</p> <p>8 transcripts evidence from a number of people which</p> <p>9 explained, for example, that BP sought to influence the</p> <p>10 JV security systems and procedures by providing various</p> <p>11 process documents, that BP through its Algiers office</p> <p>12 provided weekly reports on the security situation in</p> <p>13 Algeria, that BP in various ways liaised with the</p> <p>14 liaison team on a very regular basis, that the</p> <p>15 management of the liaison team required them to provide</p> <p>16 regular reports to the managers within the JV who came</p> <p>17 from the parent companies?</p> <p>18 <b>A. Mmm.</b></p> <p>19 Q. So really the basis for your opinion that is set out</p> <p>20 there is simply the fact that Mr Shaw was unable to</p> <p>21 attend on one occasion --</p> <p>22 <b>A. No.</b></p> <p>23 Q. -- because, as I think you do know, the drivers strike</p> <p>24 was occurring?</p> <p>25 <b>A. No, what you are saying is that BP, for example,</b></p> <p style="text-align: center;">Page 87</p>
<p>1 representation where security has on the agenda and</p> <p>2 through JV reviews and audits is part of the quality</p> <p>3 assurance plan."</p> <p>4 Then you make reference to an audit performed by</p> <p>5 Sonatrach and that the BP security manager regularly</p> <p>6 visited. Then there is something about transfer of</p> <p>7 responsibilities and then as I say, the independent</p> <p>8 newspaper report and Mr Morgan's reported</p> <p>9 dissatisfaction with security?</p> <p>10 <b>A. Yes. There is no evidence to suggest that the parent</b></p> <p>11 <b>companies were providing any positive support to the</b></p> <p>12 <b>security at the In Amenas site during the latter part of</b></p> <p>13 <b>2012 and that's the opinion that I've come to and the</b></p> <p>14 <b>fact that the BP manager had not been near the site for</b></p> <p>15 <b>nearly two years, I've seen no input that Statoil had</b></p> <p>16 <b>produced any oversight or any monitoring of the site or</b></p> <p>17 <b>indeed Sonatrach in the fact that they weren't assisting</b></p> <p>18 <b>either, so it would -- it appeared to me that the JV</b></p> <p>19 <b>were out there on their own effectively. That's what</b></p> <p>20 <b>I'm saying.</b></p> <p>21 Q. Yes, there is a difference of course between no evidence</p> <p>22 and positive evidence --</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. -- which is what you have stated in your opinion?</p> <p>25 <b>A. Yes. It is my opinion.</b></p> <p style="text-align: center;">Page 86</p>	<p>1 <b>provided a lot of information. They fed a lot of</b></p> <p>2 <b>information in to the JV of which the JV either did or</b></p> <p>3 <b>didn't take notice of. What I'm saying is from</b></p> <p>4 <b>a management level there is no evidence that the parent</b></p> <p>5 <b>companies actually helped monitor the security of the JV</b></p> <p>6 <b>or indeed had any oversight of it. That is totally</b></p> <p>7 <b>different to providing them with documentation and</b></p> <p>8 <b>trying to influence them.</b></p> <p>9 Q. Let us just carry on with this section of your report.</p> <p>10 It is over the page. You say:</p> <p>11 "Furthermore, the enforced change of security</p> <p>12 responsibilities at a time when the industrial action of</p> <p>13 the drivers strike was still continuing..."</p> <p>14 Pausing there, by that you are referring to the</p> <p>15 transfer of the responsibility for the guards to SSI?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. "...may have led to some confusion amongst both</p> <p>18 management and staff as to who was responsible for which</p> <p>19 elements of the security organisation."</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. Is there any basis for setting out an opinion that there</p> <p>22 may have been some confusion?</p> <p>23 <b>A. Yes, because in fact there are witnesses that have said</b></p> <p>24 <b>exactly that, that they weren't sure who was doing what.</b></p> <p>25 Q. You have read the transcripts?</p> <p style="text-align: center;">Page 88</p>

<p>1 <b>A. Yes.</b></p> <p>2 Q. You have read, therefore, Mr Fitzpatrick's account?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. And he was asked expressly -- sir, for your note it is</p> <p>5 Day 8, page 58:</p> <p>6 "Did the fact that both the liaison team and the ASI</p> <p>7 were liaising with the Gendarme cause confusion?"</p> <p>8 And he said:</p> <p>9 "Not that I could see and sometimes we liaised</p> <p>10 together."</p> <p>11 <b>A. That of course is post my report, that information.</b></p> <p>12 Q. Then you go on to say, and this is the paragraph</p> <p>13 beginning "Whilst":</p> <p>14 "Whilst it cannot be said that the Sonatrach regime</p> <p>15 changes had a direct impact upon the terrorist attack it</p> <p>16 is possible because of the confusion in the facility</p> <p>17 that security concerns/observations were not addressed</p> <p>18 correctly or that security intelligence was handled</p> <p>19 [I think that should be was not handled] effectively</p> <p>20 during the transition."</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. Was there any evidence that you had seen which allowed</p> <p>23 you to express the opinion that that was something that</p> <p>24 could have happened?</p> <p>25 <b>A. Yes, because if -- in Mr Fitzpatrick's statements that</b> Page 89</p>	<p>1 Q. And you have said a couple of times that you can't</p> <p>2 guarantee with any border, let alone a border of this</p> <p>3 size, that you are going to pick up at the border</p> <p>4 everyone who wants to get through, tries to get through,</p> <p>5 who has ill intent?</p> <p>6 <b>A. Mmm.</b></p> <p>7 Q. No guarantee of that?</p> <p>8 <b>A. No.</b></p> <p>9 Q. I don't think anyone would disagree. Of course, there</p> <p>10 are examples in the papers of people getting through but</p> <p>11 being picked up?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. You have said that it shouldn't be assumed that there</p> <p>14 were 7,000 soldiers all standing in a line holding</p> <p>15 hands?</p> <p>16 <b>A. Mmm.</b></p> <p>17 Q. Again, nobody has really suggested that, have they?</p> <p>18 <b>A. No, I was putting into context the question I was asked</b> <b>or the response I was asked.</b></p> <p>19 Q. And when reference is made to 7,000 troops you are aware</p> <p>20 that in fact that is a report of the additional troops</p> <p>21 that were put on to the border patrols?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. There were a number, which I think the witnesses have</p> <p>24 described as being unknown but possibly in thousands?</p> <p>25 Page 91</p>
<p>1 <b>I read there was discussion about him trying to discuss</b> <b>with the new ASI and with the Gendarmes about security</b> <b>issues and he was told that was not his responsibility</b> <b>and, in fact I don't think it was him personally,</b> <b>I think it went out to the team, that they no longer had</b> <b>any influence over the activities of the ASI or the</b> <b>security guards.</b></p> <p>2 Q. "Security intelligence was not handled effectively</p> <p>3 during the transition."</p> <p>4 <b>A. Because it was going to the liaison team but it wasn't</b> <b>necessarily going out to the ASI. There is no evidence</b> <b>to suggest that the evidence -- that the intelligence</b> <b>that was being received by the liaison team was being</b> <b>shared with the new security structure.</b></p> <p>5 Q. I see. Let's just look at some of the things that you</p> <p>6 have said in your report and again in evidence to</p> <p>7 understand in a little more detail if we can the</p> <p>8 opinions you have expressed.</p> <p>9 You say and said in your report and said again today</p> <p>10 it's reasonable to have a security system which is</p> <p>11 effectively in layers or rings, whichever word you want</p> <p>12 to use?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. That in location begins with the border patrols?</p> <p>15 <b>A. Mmm.</b> Page 90</p>	<p>1 <b>A. Yes.</b></p> <p>2 Q. But not known and to that number were added or at least</p> <p>3 it was reported were added some 7,000 troops in 2012</p> <p>4 after the fall of the Libyan regime?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. Are you aware that there were additional helicopters</p> <p>7 located at In Amenas town and In Amenas airport?</p> <p>8 <b>A. Yes, one of the witnesses actually wrote that in their</b> <b>report but actually said they had never seen them</b> <b>flying.</b></p> <p>9 Q. Surveillance aircraft being used by the Algerian --</p> <p>10 <b>A. No, I was not aware of that.</b></p> <p>11 Q. You have read Mr Shaw's witness statement?</p> <p>12 <b>A. No, I have never seen a statement from Mr Shaw.</b></p> <p>13 Q. That's the border. Then we have the militarised zone.</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. And again, it's a zone which is made up of numbers of</p> <p>16 troops, checkpoints and troops possessing weaponry of</p> <p>17 different grades and strengths?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. We have heard from Mr Fitzpatrick that his understanding</p> <p>20 was it was pretty well equipped as a military force?</p> <p>21 <b>A. Yes, I would expect so.</b></p> <p>22 Q. Then we have the Gendarmes around particular locations</p> <p>23 and of course at this location we have the numbers that</p> <p>24 Page 92</p>

<p>1 we have read about at this particular location?</p> <p>2 <b>A. Mmm.</b></p> <p>3 <b>Q.</b> In your report so far as the Gendarmes are concerned,</p> <p>4 and it is section 4.1.1, page 25, you talk about the</p> <p>5 Gendarmes being part of this layer of security and in</p> <p>6 the middle of the page you say:</p> <p>7 "Immediately outside the facility should have been</p> <p>8 patrolled and protected by the Gendarme unit housed</p> <p>9 within the complex. Gendarmes are variously described</p> <p>10 in statements as conscripted Algerian nationals and [and</p> <p>11 this is the counter] general consensus not competent, to</p> <p>12 not conscripts and well trained."</p> <p>13 <b>A. Yes.</b></p> <p>14 <b>Q.</b> Do I understand your evidence today that your personal</p> <p>15 experience is that the Gendarmes are in fact -- the</p> <p>16 Gendarme are in fact well trained, well equipped and</p> <p>17 I think you said a paramilitary force today?</p> <p>18 <b>A. Certainly the ones in northern Algeria I have had</b></p> <p>19 <b>contact with, yes.</b></p> <p>20 <b>Q.</b> So although you set out that there are differences in</p> <p>21 the assessments --</p> <p>22 <b>A. Yes, that was --</b></p> <p>23 <b>Q.</b> -- that's your view?</p> <p>24 <b>A. Yes.</b></p> <p>25 <b>Q.</b> You have read Mr Fitzpatrick's evidence again?</p> <p style="text-align: center;">Page 93</p>	<p>1 24 hours a day, 2 to 3 kilometres around the camp and</p> <p>2 that their patrols were seen by him and at night were</p> <p>3 checked by a night OLC, the person who was responsible</p> <p>4 for checking the patrols?</p> <p>5 <b>A. Right.</b></p> <p>6 <b>Q.</b> Yes?</p> <p>7 <b>A. Yes.</b></p> <p>8 <b>Q.</b> You have seen all of that?</p> <p>9 <b>A. Yes.</b></p> <p>10 <b>Q.</b> So if that's correct, if those accounts are correct,</p> <p>11 they are a well trained, well equipped sizeable force</p> <p>12 who provided the last of the outer rings of security and</p> <p>13 were set up to include a unit which should be available</p> <p>14 to respond to an incident immediately, he said within</p> <p>15 ten minutes they should be mobilised and in place, and</p> <p>16 with equipment and weaponry which would be significant?</p> <p>17 <b>A. One assumes so, yes, from the evidence that</b></p> <p>18 <b>Mr Fitzpatrick gave.</b></p> <p>19 <b>Q.</b> You say in your report -- this is page 29 -- that one of</p> <p>20 the things that you think could and should have been</p> <p>21 done is to use the Gendarmes or for the Gendarmes to man</p> <p>22 the guard towers?</p> <p>23 <b>A. Yes.</b></p> <p>24 <b>Q.</b> And now in the course of your evidence you have talked</p> <p>25 more about having Gendarmes or a Gendarme in a pillbox</p> <p style="text-align: center;">Page 95</p>
<p>1 <b>A. Mmm.</b></p> <p>2 <b>Q.</b> And he said it was well trained, a well trained,</p> <p>3 a professional unit, no conscripts, they had medium to</p> <p>4 heavy weapons on site, light machineguns and mortars,</p> <p>5 125 mm mortars, rocket launchers, they had night vision</p> <p>6 goggles?</p> <p>7 <b>A. Which was the last comment that they were not conscripts</b></p> <p>8 <b>and well trained.</b></p> <p>9 <b>Q.</b> Day 6, page 133 and Day 8, page 18. So the Gendarmes,</p> <p>10 whatever you said in your report, in your view are</p> <p>11 likely to be well trained?</p> <p>12 <b>A. Yes.</b></p> <p>13 <b>Q.</b> Well equipped, a paramilitary force of the sort</p> <p>14 described by Mr Fitzpatrick?</p> <p>15 <b>A. Yes.</b></p> <p>16 <b>Q.</b> There was a Quick Reaction Force which Mr Fitzpatrick</p> <p>17 described as being a force that was ready within --</p> <p>18 ready 24 hours a day with weapons. They were in a</p> <p>19 separate accommodation area from the rest of the troops.</p> <p>20 They had their own cabins and they were there with their</p> <p>21 weapons and vehicles on standby?</p> <p>22 <b>A. Yes.</b></p> <p>23 <b>Q.</b> You have read his evidence that as far as he's aware,</p> <p>24 and he's the liaison team person, one of the two liaison</p> <p>25 team people on site at In Amenas, they patrolled</p> <p style="text-align: center;">Page 94</p>	<p>1 outside the gate?</p> <p>2 <b>A. Yes.</b></p> <p>3 <b>Q.</b> So I have understood the reasoning behind this, you say</p> <p>4 that their presence may provide some sort of deterrent</p> <p>5 in the first place?</p> <p>6 <b>A. Yes.</b></p> <p>7 <b>Q.</b> Though you'd agree, I am sure, that one person standing</p> <p>8 outside the gate is not going to provide any greater</p> <p>9 deterrent than, say, a patrol of Gendarmes fully armed</p> <p>10 and visible?</p> <p>11 <b>A. No, I wouldn't agree with that at all. The presence at</b></p> <p>12 <b>the gate would be a permanent presence where you have</b></p> <p>13 <b>got a permanent sentry. The patrols around the site</b></p> <p>14 <b>were random and the distance was far.</b></p> <p>15 <b>Q.</b> I am not talking about their effectiveness but in terms</p> <p>16 of a deterrent if you saw a vehicle with four or five</p> <p>17 Gendarmes that would --</p> <p>18 <b>A. That would help, would be another line of deterrent,</b></p> <p>19 <b>yes.</b></p> <p>20 <b>Q.</b> You say in the report that they would be able to scan</p> <p>21 the perimeter, I think you are talking about them being</p> <p>22 in the guard tower --</p> <p>23 <b>A. Yes.</b></p> <p>24 <b>Q.</b> -- if they were outside the gate --</p> <p>25 <b>A. Mmm.</b></p> <p style="text-align: center;">Page 96</p>

24 (Pages 93 to 96)



1 Q. -- in a pillbox. They too would presumably be able to  
 2 scan the perimeter, not from the same vantage point as  
 3 the guard towers but that would be a helpful thing for  
 4 them for them to be able to do?  
 5 **A. Yes.**  
 6 Q. But we know of course that at the perimeter there were  
 7 CCTV cameras with pan tilt zoom facility which could  
 8 also provide that sort of scanning benefit?  
 9 **A. A benefit, yes.**  
 10 Q. And perhaps a greater benefit than a pair of human eyes  
 11 standing at the gate?  
 12 **A. No.**  
 13 Q. No?  
 14 **A. No. Not at the gate, we are talking about the guard  
 15 towers and you suggested that if there was a Gendarme or  
 16 a security person in a guard tower he would have a line  
 17 of sight. He has a much better view of site than a CCTV  
 18 camera does because someone has to be watching the CCTV  
 19 camera.**  
 20 Q. Of course.  
 21 **A. And they don't.**  
 22 Q. They don't?  
 23 **A. People tend not to watch a CCTV camera constantly.**  
 24 Q. So if the person who's responsible for watching the  
 25 CCTV, and we heard there was somebody responsible for

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1 doing that 24 hours a day, and that there were these  
 2 pathfinder alarms put into the system which would draw  
 3 attention to?  
 4 **A. At the fence line.**  
 5 Q. At the fence line -- draw attention to --  
 6 **A. What they wouldn't do was raise an alarm for anybody who  
 7 was external of that fence line in order to direct  
 8 a camera to it or indeed the CCTV operator.**  
 9 Q. I am sorry, I didn't understand that. You mean beyond  
 10 the fence line?  
 11 **A. Yes.**  
 12 Q. Yes, of course.  
 13 **A. So unless he happened to be scanning that way with a  
 14 camera at that precise time he wouldn't pick him up.  
 15 Whereas a pair of eyes tends to.**  
 16 Q. So a Gendarme's pair of eyes as opposed to CCTV  
 17 operator's pair of eyes you think might be better at  
 18 doing that?  
 19 **A. Yes.**  
 20 Q. Would it be right to say obviously having a Gendarme  
 21 armed at the gates provides the benefit that they can  
 22 engage in fire if they see somebody approaching?  
 23 **A. Yes.**  
 24 Q. You say in your report, and it is page 29 again, that  
 25 the facts would suggest that the JV management had not

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1 asked for the towers to be manned by the Gendarmes since  
 2 the JV assessment of the current threat did not warrant  
 3 such action. You are aware through the evidence that  
 4 has been given that certainly the JV management did not  
 5 ask that the gates or the guard towers be manned by  
 6 Gendarmes, but you are aware that the security advice  
 7 for the JV and the single point of contact with the  
 8 Gendarmes was the liaison team?  
 9 **A. Yes.**  
 10 Q. And you will have seen evidence now from Mr Fitzpatrick  
 11 that in fact the Gendarmes were asked to man the guard  
 12 towers at least and I think, as Mr Ritchie put it, with  
 13 reducing persistence over the years but certainly that  
 14 was something that he said he had personally requested  
 15 through the Gendarme captain?  
 16 **A. Yes, so I understand.**  
 17 Q. Mr Fulcher was asked whether effectively the presence of  
 18 Gendarmes at or by the front gate would have made any  
 19 difference at all to this attack. His answer was that  
 20 that would have depended on whether they were static  
 21 guards or camps of Gendarmes and he said at page 60 of  
 22 the transcript:  
 23 "If the terrorists had been aware of separate  
 24 Gendarme camps independently placed alongside the  
 25 different locations within the overall facility they

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1 would have had to have factored that into their  
 2 planning. What they would have then done, I don't know,  
 3 nobody knows but it would have complicated their  
 4 planning for this operation if they had had to have  
 5 tackled three separate Gendarme camps each with its own  
 6 quick reaction capability stationed at separate  
 7 locations across the facility."  
 8 So three lots of camps, each with their Quick  
 9 Reaction Force capability, that is 12 Gendarmes in each  
 10 force, suitably armed and equipped, then that may have  
 11 caused the terrorists to have made a change to their  
 12 planning?  
 13 **A. I wouldn't disagree with that at all.**  
 14 Q. But you say one Gendarme --  
 15 **A. Would also.**  
 16 Q. -- in the pillbox could have made a difference?  
 17 **A. Could have done.**  
 18 Q. And you say however that a civilian armed guard with  
 19 arms at the gate however would not have made  
 20 a difference?  
 21 **A. It would be unlikely and I gave my reasoning for that,  
 22 was to do with training and visibility and perception of  
 23 a civilian security guard's ability to fend off an  
 24 attack. Particularly as he would probably be armed with  
 25 a side arm because that's the only way he could properly**

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1 **operate the gates and the like.**  
 2 Q. So it would depend on what he was armed with?  
 3 **A. Yes.**  
 4 Q. As to whether or not he could respond to the terrorist?  
 5 **A. Yes.**  
 6 Q. If the person based there had greater weaponry that  
 7 might assist?  
 8 **A. It might assist, yes.**  
 9 Q. And you think that a civilian armed guard would in some  
 10 way be less of a deterrent than the Gendarme?  
 11 **A. Yes.**  
 12 Q. And the terrorists would be able to perceive that --  
 13 **A. Yes.**  
 14 Q. -- and see that there is a difference between them and  
 15 take that into account?  
 16 **A. Mmm.**  
 17 Q. What you say also in your report -- this is  
 18 paragraph 4.2.2 -- is given the item heightened risk in  
 19 southern Algeria it is your professional opinion that:  
 20 "The JV executive and the security representatives  
 21 of the parent company should have at least considered  
 22 the possibility of an armed attack on the facility. In  
 23 this respect their security planning assumptions were  
 24 flawed since they discounted such an event was  
 25 conceivable."  
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1 **A. Mmm.**  
 2 Q. We have in fact seen lots of documents in which an armed  
 3 attack has been identified?  
 4 **A. Yes.**  
 5 Q. You have heard evidence and Mr Ritchie explained that  
 6 a number of the answers that were given to his questions  
 7 from people were that they hadn't conceived of an attack  
 8 of this scale. But you have heard evidence, for  
 9 example, from Mr Fitzpatrick that there was the  
 10 possibility of an attack which had been considered?  
 11 **A. Mmm.**  
 12 Q. And that there was a plan in place, as he put it, and  
 13 the first and most important part of that plan or  
 14 system, not for an attack of the scale that occurred,  
 15 I make that very clear, but part of the system, the  
 16 first part of it, the most important part of it was to  
 17 ensure or try and ensure that if the armed terrorists  
 18 got to, and we have just used the term "the front of the  
 19 gates" but got to a point close to the facility, that  
 20 they would be engaged by Gendarmes with sufficient  
 21 weaponry who could take out the terrorists if they  
 22 approached and before they got into the actual camp.  
 23 You have seen Mr Fitzpatrick's explanation?  
 24 **A. Yes.**  
 25 Q. And he said that is why the Gendarmes were there and why  
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1 they were there in the numbers they were there?  
 2 **A. Yes.**  
 3 Q. So one vehicle with two or three armed terrorists could  
 4 be met by Gendarmes of a large number. We know there  
 5 were 160 supposed to be on site, but presumably not all  
 6 160 would be engaged?  
 7 **A. Yes.**  
 8 Q. But a number?  
 9 **A. Yes.**  
 10 Q. And they could and should properly be met in the first  
 11 instance by the Quick Reaction Force, made up of 12  
 12 Gendarmes with weapons?  
 13 **A. Yes.**  
 14 Q. But of course that plan depends on the Gendarmes having  
 15 sufficient notice to be mobilised in time to engage the  
 16 terrorists when they get to that sort of point?  
 17 **A. Quite so.**  
 18 Q. So the system of providing notice included the provision  
 19 of Gendarme patrols, patrolling around the area, yes?  
 20 **A. Yes.**  
 21 Q. Guards at the VCPs?  
 22 **A. Yes.**  
 23 Q. And it was said to you, well they're just 1 kilometre  
 24 away, therefore by the time they raise the notice the  
 25 terrorists are potentially much closer, but of course  
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1 whilst they are 1 kilometre away what they can see is  
 2 much further than 1 kilometre away, isn't it, because we  
 3 know there is good clear visibility around the  
 4 checkpoints?  
 5 **A. Yes.**  
 6 THE CORONER: And you are suggesting that the patrolling  
 7 should be something of that order, aren't you, but less  
 8 than 2 or 3 kilometres yourself, so.  
 9 **A. Yes, so if the patrols are close in they're going to**  
 10 **respond quite quickly. (a) they're going to see what's**  
 11 **going on quickly and be able to respond quicker.**  
 12 MR POPAT: Then there are CCTV operators who are there to  
 13 scan and examine the area.  
 14 **A. Yes.**  
 15 Q. And we know that the CCTV cameras point out in different  
 16 directions but can see as far at least as VCP1?  
 17 **A. Yes.**  
 18 Q. And of course there are guards who are within the camp  
 19 who have a patrolling function as well?  
 20 **A. Yes.**  
 21 Q. We were told by Mr Fitzpatrick that's what they had to  
 22 do?  
 23 **A. Yes.**  
 24 Q. I think he said at one stage, in answer to the coroner's  
 25 questions, because the Gendarmes refused to put people  
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1 into the towers he said more should be done by the  
 2 people patrolling within the camp?  
 3 **A. Yes.**  
 4 **Q.** So it is quite possible that none of them would actually  
 5 have stopped the terrorists getting to the front gate  
 6 but the system was there to try and identify people  
 7 approaching the camp from a distance in sufficient time  
 8 to allow the Gendarmes to be mobilised and get to the  
 9 front gate if that's where they have to get to, to  
 10 provide the protection?  
 11 **A. In principle, yes.**  
 12 **Q.** And if they did that, then with one vehicle with one or  
 13 two terrorists you would expect that they would be able  
 14 to engage and provide some resistance --  
 15 **A. Assuming they had enough time to respond, yes.**  
 16 **Q.** -- to ensure they didn't get further. Mr Fitzpatrick  
 17 said in fact that even if the terrorists in this  
 18 scenario got beyond the outer gate, got into the camp  
 19 beyond the outer gate, he would still expect the  
 20 Gendarmes to engage with the terrorists and that's what  
 21 he was clear in his mind they would have done --  
 22 **A. Yes.**  
 23 **Q.** -- had that situation arisen. So the system was to use  
 24 the Gendarmes with their expertise and weaponry to  
 25 provide that protection around the perimeter of the

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1 camp, having obtained as much notice as possible through  
 2 those different means?  
 3 **A. Mmm.**  
 4 **Q.** The second part of the system was the construction of  
 5 physical security measures to try and at least delay an  
 6 attack and in some respects deter a certain times of  
 7 attack?  
 8 **A. Yes.**  
 9 **THE CORONER:** Mr Popat, I think we might come back to that  
 10 at 2 if that is as good a place as any. 2 o'clock.  
 11 (1.00 pm)  
 12 (Luncheon Adjournment)  
 13 (2.00 pm)  
 14 **MR POPAT:** Mr Braziel, before the lunch break I'd asked you  
 15 about the comment in your report at paragraph 4.2.2 that  
 16 the JV executive and security representative should have  
 17 at least considered the possibility of an armed attack  
 18 on the facility and that their assumptions were flawed  
 19 you said because they didn't even conceive of such  
 20 a possibility. What I suggested to you was that it was  
 21 clear in fact that the possibility of an armed attack of  
 22 a different scale had expressly been considered and  
 23 Mr Fitzpatrick explained the arrangements that he  
 24 thought were in place to try and protect against that  
 25 sort of attack.

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1 The first part of what I was discussing with you  
 2 before lunch was the system whereby the Gendarme and  
 3 particularly the Quick Reaction Force would be mobilised  
 4 and be able to provide the protection at the gates and  
 5 if the terrorists got beyond the gates also to engage at  
 6 that point, yes?  
 7 You have read, I assume, Mr Fitzpatrick's evidence  
 8 that he was aware of the Gendarmes carrying out drills,  
 9 I think, on a fairly regular basis, he said, including  
 10 one drill that he himself observed which involved them  
 11 mobilising and getting to the gates of the camp to test  
 12 how they would respond in the event of an emergency?  
 13 **A. Yes, I believe that was in his oral evidence, yes, which**  
 14 **I got afterwards, yes.**  
 15 **Q.** The second part of what I was wanting to look at with  
 16 you in relation to your comment in your report was the  
 17 physical security measures that were present which might  
 18 at least delay the attack.  
 19 It was stated expressly in the security management  
 20 plan and has been stated in witness statements and  
 21 orally that the physical security measures at the site  
 22 couldn't prevent an attack from taking place?  
 23 **A. No.**  
 24 **Q.** But the sorts of things that were envisaged and sought  
 25 to protect against by way of physical security measures

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1 include, for example, the possibility of a vehicle  
 2 trying to attack, possibly with a bomb or with  
 3 terrorists, the camp and trying to get into the camp  
 4 through the fences?  
 5 **A. Yes.**  
 6 **Q.** And so concrete barriers were identified and put in  
 7 place around the BdV to try and delay, at least, anyone  
 8 trying to do that and possibly even stop them, yes?  
 9 **A. Quite so.**  
 10 **Q.** Double perimeter fencing was identified as a physical  
 11 security measure which would provide again some delaying  
 12 protection at least as a measure to be put in place?  
 13 **A. Yes.**  
 14 **Q.** And an outer steel mesh perimeter fence was put in  
 15 place, yes?  
 16 **A. Yes.**  
 17 **Q.** And there was a gap between the outer fence and the  
 18 inner fence which also provides protection, doesn't it?  
 19 **A. Yes, it does.**  
 20 **Q.** It provides a buffer area?  
 21 **A. Yes.**  
 22 **Q.** Then there was an inner fence, again constructed in the  
 23 same sort of way --  
 24 **A. Yes.**  
 25 **Q.** -- to provide that sort of protection. A chicane was

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1 constructed at the gate to the BdV?  
 2 **A. Yes.**  
 3 Q. And constructed in a, would you agree, sensible but  
 4 standard design?  
 5 **A. Yes.**  
 6 Q. Three posts, positioned a certain distance apart which  
 7 wouldn't prohibit any vehicle getting through but would  
 8 if it worked slow them down?  
 9 **A. Slow them, yes.**  
 10 Q. And they were constructed of strong posts, material  
 11 which would provide protection in case they were hit by  
 12 a vehicle approaching?  
 13 **A. Mmm.**  
 14 Q. Led to outer gates, to the camp?  
 15 **A. Yes.**  
 16 Q. Which were sliding gates?  
 17 **A. Yes.**  
 18 Q. Again, a sensible security measure to have sliding gates  
 19 as opposed to gates on pivot hinges?  
 20 **A. Either or.**  
 21 Q. Really?  
 22 **A. Mmm.**  
 23 Q. I think it was Mr Fitzpatrick who explained that the  
 24 benefit of a sliding gate is of course it's stronger  
 25 because it doesn't have the weak points of the pivot

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1 hinges, but in any event sliding gates. Made from  
 2 metal?  
 3 **A. Yes.**  
 4 Q. Have you seen the photographs of the --  
 5 **A. No.**  
 6 Q. You have?  
 7 **A. No.**  
 8 Q. Made of metal with sections in them, I think there were  
 9 five or so sections in them?  
 10 THE CORONER: If you haven't seen it can we just get that  
 11 up?  
 12 MR POPAT: Of course.  
 13 THE CORONER: You might as well.  
 14 MR POPAT: Perhaps if we can do it just from this point if  
 15 that's convenient, sir, just so that -- to help you,  
 16 Mr Braziel, if you haven't seen these photographs.  
 17 **A. No, I haven't.**  
 18 Q. These are photographs of the exterior to the BdV taken  
 19 in January 2012?  
 20 **A. Okay.**  
 21 Q. This is a photograph which shows the approach turning  
 22 off the access road into the BdV and on the left is the  
 23 external car parking area, do you see that?  
 24 **A. Yes, okay, yes.**  
 25 Q. And it is surrounded by T bars with a gap in between to

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1 allow vehicles obviously to get through?  
 2 **A. Mmm.**  
 3 Q. That, we will come back to this, but that was, were you  
 4 aware, the external parking for everyone who was coming  
 5 to the BdV who didn't belong in the BdV, yes?  
 6 **A. Yes.**  
 7 Q. So all visitors would be expected to park their vehicles  
 8 there?  
 9 **A. Yes.**  
 10 Q. And the only vehicles that would get through into the --  
 11 through the outer gate would be those parking their  
 12 vehicles because they were resident at the BdV?  
 13 **A. Yes.**  
 14 Q. And the only vehicles that would go through the inner  
 15 gate would be those limited number of service vehicles  
 16 who had to make deliveries to parts of the camp, yes?  
 17 **A. Yes.**  
 18 Q. So this photograph shows the entrance to that external  
 19 parking area. You see just to the right-hand side,  
 20 middle of the photograph the outer barrier post, do you  
 21 see that?  
 22 **A. Yes.**  
 23 Q. If we go on to the next photograph, please, we can see  
 24 that a little closer. It is at the top end of the  
 25 chicane?

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1 **A. Yes, I have it.**  
 2 Q. The chicane itself is protected from lateral attack by  
 3 the presence of the concrete T bar barriers on either  
 4 side, isn't it?  
 5 **A. Yes, it is.**  
 6 Q. And again that is a sensible --  
 7 **A. Yes, it is.**  
 8 Q. -- important security provision?  
 9 **A. Mmm.**  
 10 THE CORONER: So the striped barrier, you see the angle --  
 11 that is the one, is it, that would come across and lock  
 12 into the end of the last right of the standing posts,  
 13 have I got it right?  
 14 MR POPAT: Yes, sir. We can just see it there. If we see  
 15 it on the last photograph. It is attached to one of  
 16 those chicane type posts but on the far side.  
 17 THE CORONER: Yes.  
 18 MR POPAT: So we have the T bar barriers on either side and  
 19 that protects against lateral attack. We have the front  
 20 of the chicane with this metal post, obviously we can't  
 21 see it's metal but I think Mr Fitzpatrick told us it  
 22 was, attached to that post.  
 23 **A. Yes.**  
 24 Q. If we go on to the next photograph, please, we see the  
 25 start of the chicanes, so the swing arm barrier is

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1 attached to the post just at the edge of the photograph  
 2 on the left-hand side and then we have the start of the  
 3 chicanes which are the three post system positioned all  
 4 the way down the road up to the gate?  
 5 **A. Yes.**  
 6 Q. Then if we go to the next photograph, please, we see the  
 7 gate slid open?  
 8 **A. Okay.**  
 9 Q. You see the sort of structure it is?  
 10 **A. Yes.**  
 11 Q. I think if we can go to the next photograph we can see  
 12 it a little better there but possibly the one after that  
 13 will be the clearest view.  
 14 **A. Right.**  
 15 Q. So we see the gate. It is a metal structure with mesh?  
 16 **A. Chain link fencing, yes.**  
 17 Q. Chain link fencing in between. I was saying to you  
 18 there were five sections. Do you see the sections in  
 19 the photograph?  
 20 **A. Yes, I do.**  
 21 Q. Do you see at the far end the far end section has  
 22 a cross with the metal barriers going through it?  
 23 **A. Yes.**  
 24 Q. Then we have four other sections with the vertical posts  
 25 going down each section?

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1 **A. Mmm.**  
 2 Q. And those posts provide protection as well, don't they?  
 3 **A. They strengthen the gate.**  
 4 Q. And if anything is trying to strike through the fence as  
 5 long as the width of the section isn't so wide that it  
 6 can get through it stops or at least restricts the  
 7 ability of a vehicle, for example, driving straight  
 8 through the fence?  
 9 **A. Yes, it does.**  
 10 Q. At the bottom of the fence all the way along is another  
 11 horizontal barrier which itself is slightly heightened,  
 12 raised or increased in size, which again provides  
 13 protection because of course a vehicle would have to get  
 14 over that barrier which is at the bottom of the fence?  
 15 **A. Yes.**  
 16 Q. Yes?  
 17 **A. Mmm.**  
 18 Q. Just to make sure you have seen all the photographs,  
 19 Mr Braziel, if we look at the next photograph, that is  
 20 looking at the outside --  
 21 **A. Going the other way.**  
 22 Q. -- from the inside?  
 23 **A. Yes.**  
 24 Q. And there is a speed bump there, you can see just at the  
 25 gate. I didn't point out to you before there wasn't

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1 a speed bump at the front of the chicanes?  
 2 **A. No, I can't see one.**  
 3 Q. And the next photograph, please, we see this beyond the  
 4 outer gate there is a vehicle swing arm barrier. This  
 5 isn't a swing round but a raising up and down type of  
 6 vehicle barrier and beyond that in the distance we see  
 7 the inner gate?  
 8 **A. Yes.**  
 9 Q. Which we might see a little better in the next  
 10 photograph or maybe not, but the one after that. That  
 11 is the end one. We can see it there. The gentleman in  
 12 sort of dark coloured clothing is right at the edge of  
 13 the inner gate?  
 14 **A. Yes, it looks of similar construction to the outer gate.**  
 15 Q. Exactly. Again, as we were told, a sliding gate  
 16 constructed in a similar sort of way?  
 17 **A. Yes.**  
 18 Q. So the measures that were in place which, I make it  
 19 absolutely clear there is no dispute between us,  
 20 wouldn't have prevented an attack of this scale taking  
 21 place, but to seek to delay at least an attack were  
 22 those measures that we have just talked about?  
 23 **A. Yes.**  
 24 Q. We have looked at?  
 25 **A. Assuming the gates were closed.**

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1 Q. Well, the measures there -- of course it has to be  
 2 operated in and you would say the gates should be  
 3 closed.  
 4 **A. Yes.**  
 5 Q. Of course. Now, in your report, this is page 33,  
 6 I should just for completeness and in fairness to you,  
 7 Mr Braziel, just point out if you go back a page,  
 8 page 32, this is where you are beginning your discussion  
 9 about the additional security measures that I am just  
 10 going to take you to.  
 11 **A. Yes.**  
 12 Q. And you say what I have already put to you.  
 13 But what you go on to say on this page on page 33  
 14 beginning at the second sentence:  
 15 "Given the increased tensions in the region  
 16 a 'hardened' security perimeter should have been  
 17 installed. Industry 'best practice' suggests  
 18 a combination of the following."  
 19 Now, you were asked specifically to identify things  
 20 that you think might have made a change or been better  
 21 or may have helped in some way?  
 22 **A. Yes.**  
 23 Q. And what you did was to set these out here in your  
 24 report.  
 25 **A. Yes.**

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1 Q. And you said "industry 'best practice' suggests  
2 a combination of these". I just want to understand that  
3 with you. The first thing you identified was hostile  
4 vehicle mitigation barriers. Are they effectively  
5 T bars?  
6 **A. Yes.**  
7 Q. So T bars. Then within that bullet point you said "an  
8 outer security fence fitted with a perimeter detection  
9 system linked to a monitored CCTV system."  
10 **A. Mmm.**  
11 Q. So focusing on the BdV, at least, there were hostile  
12 vehicle mitigation barriers?  
13 **A. Yes.**  
14 Q. There was a perimeter detection system linked to  
15 a monitored CCTV system, yes?  
16 **A. Yes.**  
17 Q. Then you say "solid anti-climbs wall topped with razor  
18 wire."  
19 **A. Mmm.**  
20 Q. You haven't mentioned that in the course of your  
21 evidence today but what you were clearly referring to in  
22 your report was a solid wall, so not a chain link fence?  
23 **A. Yes.**  
24 Q. But some sort of --  
25 **A. It is another type of protection.**

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1 Q. Have you ever seen a solid wall erected around  
2 a facility like this in the desert?  
3 **A. Yes, there's one 20, 25-miles long around Camp Bastion  
4 in Afghanistan, in the desert.**  
5 Q. Around an oil and gas facility?  
6 **A. Yes, in Lebanon. Not of that size but round facilities  
7 in the Lebanon.**  
8 Q. What Mr Fitzpatrick, Mr Wigg, Mr Butt explained to the  
9 inquest is that you wouldn't have solid walls around  
10 a desert facility because there would be the very real  
11 risk of sand banking up to the walls?  
12 **A. Yes.**  
13 Q. Providing an easier route of access for anyone wanting  
14 to get over the walls?  
15 **A. Yes.**  
16 Q. You would also lose the benefit, which is a real  
17 benefit, of having visibility through the walls so you  
18 can scan the area around the perimeter?  
19 **A. Assuming someone is doing that, yes.**  
20 Q. That was the recommendation from the liaison team for  
21 this location and certainly in their experience what  
22 would be the normal arrangement at any oil and gas  
23 facility in a desert. So when you say "industry  
24 practice suggests a combination of these things" your  
25 industry practice that you are referring to for solid

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1 walls around oil and gas facilities in the desert is  
2 based on what? The example you have given of the  
3 Lebanon?  
4 **A. Yes, one is the Lebanon and the other one is within the  
5 BP requirements for accommodation blocks surrounded by  
6 a solid brick wall which is in the BP security plan.**  
7 Q. Yes, that is around an accommodation block. I am  
8 talking about the perimeter wall for the whole facility,  
9 right? At least would you agree with this, try to short  
10 circuit this: the far more common --  
11 **A. It is common.**  
12 Q. -- regular thing for facilities like this and therefore  
13 perhaps a clearer example of industry practice would be  
14 to have perimeter fences of the type that were in place?  
15 **A. Yes.**  
16 Q. Would you agree with that?  
17 **A. Yes, I have no problem with that.**  
18 Q. Then you say guard towers manned by armed guards and  
19 Gendarmes. We have talked about that. We will come  
20 back to that and of course that is a separate point. It  
21 is not a physical measure. The guard towers were there.  
22 It is the "manned by Gendarmes" bit I suspect that you  
23 are focusing on there?  
24 **A. Yes.**  
25 Q. So far as physical measures are concerned that is the

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1 guard towers of course there. Then a 10 to 20-metre  
2 fence clear zone inside the wall. Leaving aside the  
3 reference to the wall, even if it is a fence there  
4 should be a gap between that outer fence and whatever  
5 the inner fence is going to be?  
6 **A. Yes, and from the inner fence to the next building.**  
7 Q. So at least, I am not sure you have seen or I am not  
8 sure if you have carried out any measurements of the  
9 distances between the outer and the inner fence but we  
10 saw from the photograph for example there is  
11 a significant gap between the outer and the inner fence?  
12 **A. Yes, it's adequate.**  
13 Q. Security lighting?  
14 **A. Yes.**  
15 Q. That was present as well?  
16 **A. Yes. But not external security lighting.**  
17 Q. I am sorry?  
18 **A. Excuse me, I have a problem. The security lighting  
19 there, and I haven't explained it properly, was to put  
20 lighting external of the facility, to illuminate the  
21 desert.**  
22 Q. I will just make sure you are aware of what was there  
23 and see if you are saying there should be something  
24 different. I am sorry, I have momentarily lost my plans  
25 but there should be one of these photographs. It is the

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1 one for the living area. It is not particularly clear,  
 2 Mr Braziel, but if you see the top left which has  
 3 perimeter light/CCTV which is supposed to be the yellow  
 4 markings? (Indicated)  
 5 **A. Yes.**  
 6 Q. Then if you just take the top of the photograph of the  
 7 BdV you see where all those perimeter lights are?  
 8 **A. Yes indeed.**  
 9 Q. And they were, as we were told, pointing out into the  
 10 desert.  
 11 **A. Right.**  
 12 Q. Were you aware of that?  
 13 **A. No.**  
 14 MR RITCHIE: Can I just help my learned friend? There is  
 15 a photo of perimeter lights on the photo named "Rain  
 16 cloud".  
 17 MR POPAT: It doesn't help me at all I am afraid.  
 18 MR RITCHIE: No, but I'll pass it over. (Handed)  
 19 MR POPAT: Yes.  
 20 MR RITCHIE: That is the one on the screen.  
 21 MR POPAT: I am grateful, thank you.  
 22 **A. Okay. Yes. That's one form of perimeter lighting.**  
 23 THE CORONER: Do you want to add something?  
 24 **A. Yes, what I would say is that I would even suggest you**  
 25 **want lighting further out than that to show anybody**  
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1 **approaching the facility. That would show you someone**  
 2 **in close proximity to the fence. What you want is**  
 3 **ground lighting further out.**  
 4 MR POPAT: In the desert?  
 5 **A. Yes.**  
 6 Q. So there would be some sort of lighting, how far out  
 7 into the desert?  
 8 **A. You would probably illuminate -- about 50 metres you**  
 9 **would have your lights and that would illuminate out**  
 10 **beyond that so you would see any approach to the**  
 11 **facility.**  
 12 Q. Can I just make sure I go back and understand what --  
 13 you were referring to security lighting in your report?  
 14 **A. Yes.**  
 15 Q. I take it you were referring to this sort of perimeter  
 16 lighting?  
 17 **A. And externally.**  
 18 Q. And the external lighting would be beyond the light cast  
 19 by the perimeter lights somewhere into the desert?  
 20 **A. Yes.**  
 21 Q. Have you any sort of experience of connecting that sort  
 22 of lighting to power sources --  
 23 **A. Yes.**  
 24 Q. -- around the desert all the way round the perimeter?  
 25 **A. Yes, every military establishment I have ever worked at.**  
 Page 122

1 Q. I should make it clear, oil and gas facilities of this  
 2 type, putting it out into the desert?  
 3 **A. Let me think. Not where it goes that far out, no.**  
 4 Q. Right. So on industry best practice it's not something  
 5 that you have seen or occurs but nonetheless you say  
 6 that is something that could be done which would be some  
 7 sort of ground lighting, some distance out into the  
 8 desert?  
 9 **A. Yes.**  
 10 Q. But this perimeter lighting was present?  
 11 **A. Yes.**  
 12 Q. And that is of the type, albeit I think you were saying  
 13 there were other times that you would expect to see?  
 14 **A. Yes, that's good.**  
 15 Q. Then you say "compound entrances fitted with heavy duty  
 16 vehicle safety barriers"?  
 17 **A. Yes.**  
 18 Q. I am not quite sure what that is.  
 19 **A. What you had in those pictures in the chicanes was metal**  
 20 **posts. Traditionally you would use the T bars to form**  
 21 **the chicane.**  
 22 Q. I see. So instead of the three metal posts you'd have  
 23 the T bars positioned?  
 24 **A. Yes, so you can't actually push -- if you were to take**  
 25 **a heavy truck through there you could probably push**  
 Page 123

1 **those barriers over. Whereas a T bar you wouldn't.**  
 2 Q. Right. Okay, you are aware that in fact at the CPF they  
 3 had some positioned T bar chicanes?  
 4 **A. Yes.**  
 5 Q. And you are saying those would be --  
 6 **A. I could probably understand now, having seen those**  
 7 **photographs which is the first time I've seen them,**  
 8 **I can probably understand why they did that because they**  
 9 **were removable barriers. So if they wanted to bring**  
 10 **equipment in they could remove those easily and then do**  
 11 **that. So I understand now why they've done that.**  
 12 Q. Then "building set back 100 metres from the perimeter".  
 13 So this is beyond the inner gate, have your buildings  
 14 a bit further back from the perimeter?  
 15 **A. Yes.**  
 16 Q. Then you have, if I can lump them together, three things  
 17 that relate to the accommodation within the premises and  
 18 basically you are saying stronger construction materials  
 19 and put grilles on windows and security doors. This is  
 20 of course a camp where people live?  
 21 **A. Yes.**  
 22 Q. Not a, I don't mean this in any way disrespectfully but  
 23 it is not a prison inside the camp?  
 24 **A. No.**  
 25 Q. So this is living accommodation which is made, would you  
 Page 124

<p>1 at least agree with this, of materials which are 2 commonly used in the desert environment? 3 <b>A. Yes, I would say so.</b> 4 Q. What you do say in your report, it goes on beyond those 5 bullet points, is that interestingly you say from the 6 photograph you have seen from Mr McDaniel's PowerPoint 7 presentation the compound at Hassi is protected by a 8 solid wall perimeter and inner sterile zone? 9 <b>A. Yes.</b> 10 Q. And that the disparity between the sites is not 11 explained in the evidence you have seen. You will now, 12 I am sure, have seen Mr Wigg's evidence have you? 13 <b>A. Yes, I have subsequently.</b> 14 Q. And he explains that Hassi is in an urban area? 15 <b>A. Yes.</b> 16 Q. It is Day 8, page 520. In answer to questions from 17 Mr Ritchie: Doesn't it have fortified walls? 18 He said no: 19 "[It] was a single skin breeze block wall." 20 Fortified gates? 21 "No, [we had] steel gates but they weren't 22 fortified." 23 Insofar as they were sheet steel. That was 24 appropriate in an urban environment like Hassi but not 25 in locations like In Amenas.</p> <p style="text-align: center;">Page 125</p>	<p>1 one other thing which has been put to you and saying 2 that something else should have happened with the 3 measures that were in place. The first thing that has 4 been raised with you and you have agreed was appropriate 5 was to have external parking? 6 <b>A. Correct.</b> 7 Q. By that I assume you mean all parking at the BdV to be 8 external? 9 <b>A. Yes.</b> 10 Q. You were asked specifically in the preparation of 11 a report to identify any measures that you thought 12 through industry best practice or otherwise were 13 appropriate and would have been warranted. You were 14 aware of the layout, at least, of the BdV? 15 <b>A. I am now.</b> 16 Q. You were aware of the layout, weren't you, because you 17 have seen it and produced parts of the Statoil report 18 which show the layout? 19 <b>A. Yes.</b> 20 Q. And at no stage in the course of your substantial report 21 did you mention the possibility of having some other 22 form of external parking? 23 <b>A. No, because I wasn't aware that that's how the parking 24 arrangements were from what I had read.</b> 25 Q. Sorry, you weren't aware that the vehicles went through</p> <p style="text-align: center;">Page 127</p>
<p>1 Holding area? "No." 2 So overall similar arrangement to In Amenas albeit 3 with solid walls rather than the perimeter fence? 4 <b>A. Yes.</b> 5 Q. Would it be fair to say, therefore, that of this 6 combination of things that you suggest are from industry 7 best practice -- 8 <b>A. Yes.</b> 9 Q. -- and I question as to whether each of these is, but of 10 those combination of things most of those things were in 11 fact in place, leaving aside your last three bullet 12 points, at the site? 13 <b>A. Yes.</b> 14 Q. Insofar as anything is different, let's take, for 15 example, your suggestion that you have T bar barriers in 16 the chicane as opposed to the metal posts, there is 17 nothing that you have seen to suggest that that was, for 18 example, recommended by the liaison team? 19 <b>A. No.</b> 20 Q. Nor, as I have already suggested to you, anything like 21 the solid wall all the way round the perimeter? 22 <b>A. No, it wasn't.</b> 23 Q. Nor in case it is different the lights out into the 24 desert some distance away. 25 Today in your evidence you have identified at least</p> <p style="text-align: center;">Page 126</p>	<p>1 the gates and parked on the other side of the outer 2 gate? 3 <b>A. No.</b> 4 Q. You weren't? 5 <b>A. No.</b> 6 Q. I won't take up time now just finding the photographs 7 and things from the Statoil report you have identified 8 but the photograph we have just looked at comes from the 9 Statoil report, doesn't it? 10 <b>A. I don't believe so.</b> 11 Q. Don't worry, we will come back to that if we need to. 12 But anyway, you now say well that would have been 13 a good idea? 14 <b>A. Yes.</b> 15 Q. The benefit of it is that it reduces the number of times 16 that people have to open the gates, as I understood your 17 evidence? 18 <b>A. Yes.</b> 19 Q. The situation that pertained at In Amenas was that only 20 vehicles which, if you like, belonged to the camp would 21 go beyond the outer gate? 22 <b>A. Right.</b> 23 Q. The risk that would be posed, would you agree, of 24 putting all parking outside is that those vehicles which 25 would be driven, for example, by expats would have to be</p> <p style="text-align: center;">Page 128</p>



<p>1 parked outside the secure areas of the camp?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. One of the principal, if not the biggest risks of</p> <p>4 terrorist attacks that had been identified, was the risk</p> <p>5 of a car bomb being driven up to the camp --</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. -- and being detonated, being very serious?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. If you put everyone in their cars into the car park</p> <p>10 outside and at peak times, for example, there are</p> <p>11 a number of cars, vehicles driven by expats with expats</p> <p>12 coming out of those vehicles, you would increase the</p> <p>13 risk of a suicide bomber driving into that car park and</p> <p>14 detonating a bomb with everyone present in the car park?</p> <p>15 <b>A. What you're assuming is that you don't actually control</b></p> <p>16 <b>entry to that outer car park.</b></p> <p>17 Q. Ah. So if you have some other control measure beyond</p> <p>18 the outer car park then you provide that additional</p> <p>19 protection?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. I see.</p> <p>22 <b>A. You don't just let people drive up and park there.</b></p> <p>23 Q. So not the arrangement that did pertain even for the</p> <p>24 external car park?</p> <p>25 <b>A. No.</b></p> <p style="text-align: center;">Page 129</p>	<p>1 Q. And the security management plan set out, as it is</p> <p>2 described both in the body of the plan and in the</p> <p>3 tracking tables, recommendations from the liaison team,</p> <p>4 didn't it?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. For your note that security management plan produced by</p> <p>7 Mr Fitzpatrick, which is the first plan which preceded</p> <p>8 the works that were done, did not include in it</p> <p>9 a recommendation for external parking of any different</p> <p>10 type at the BdV?</p> <p>11 <b>A. Not that I'm aware of.</b></p> <p>12 THE CORONER: Can you just help me, what sort of thing do</p> <p>13 you envisage as a control mechanism for getting into the</p> <p>14 external car park?</p> <p>15 <b>A. You would probably move the first checkpoint further to</b></p> <p>16 <b>the start of the chicane perhaps.</b></p> <p>17 THE CORONER: Sorry, what do you mean by the first</p> <p>18 checkpoint?</p> <p>19 <b>A. Where the first gate is, there is a security guard there</b></p> <p>20 <b>that operates that. You would probably have a security</b></p> <p>21 <b>guard controlling entry from there into that first car</b></p> <p>22 <b>park. It would probably need some movement of the</b></p> <p>23 <b>T bars or something to form an entrance in.</b></p> <p>24 THE CORONER: I mean this is in the desert, isn't it?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 131</p>
<p>1 Q. But yet another layer of fencing or some other control</p> <p>2 before you even get to that point?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. You were, and this is just for completeness, Mr Braziel,</p> <p>5 it is not anything you necessarily know about, but you</p> <p>6 were taken to some documents which were described as,</p> <p>7 I can't remember if it was the 60 page documents or the</p> <p>8 Johnston documents, but the little clip of materials and</p> <p>9 you were asked to opine on the meaning of a passage in</p> <p>10 the agenda from the JOC minute and it was I think</p> <p>11 page 17 that you were taken to.</p> <p>12 <b>A. Yes yes, it was.</b></p> <p>13 Q. You were just asked to find, I am not quite sure why it</p> <p>14 would be an expert opinion, it is just your reading of</p> <p>15 a page in this document, but just for the sake of</p> <p>16 completeness, the document which precedes that agenda is</p> <p>17 the first security management plan which begins at</p> <p>18 page 4 and it is in a similar form to the ones you have</p> <p>19 seen?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. Sorry, the one you have seen in the bundles?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. And it has towards the back tracking tables with</p> <p>24 recommendations?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 130</p>	<p>1 THE CORONER: It may be that most people who are coming are</p> <p>2 expected.</p> <p>3 <b>A. Indeed.</b></p> <p>4 THE CORONER: I don't know whether there is a lot of passing</p> <p>5 traffic. I doubt it.</p> <p>6 <b>A. I suspect there's very little passing traffic.</b></p> <p>7 THE CORONER: I should have thought so too. So on one view</p> <p>8 somebody might get picked up if they were, for example,</p> <p>9 a suicide bomber or -- may get picked up at VCPI if they</p> <p>10 are using the road. If they are not using the road and</p> <p>11 they are driving at speed across the desert that might</p> <p>12 be thought to be a sign that you would need to worry</p> <p>13 about that.</p> <p>14 <b>A. That you would probably notice that they shouldn't be</b></p> <p>15 <b>there, yes. And the other advantage of having your</b></p> <p>16 <b>vehicles external given that the under car vehicle</b></p> <p>17 <b>explosives device is regarded as a threat is that you</b></p> <p>18 <b>keep your vehicles 200 metres away from your living</b></p> <p>19 <b>accommodation, so the further they are away the better</b></p> <p>20 <b>they are.</b></p> <p>21 MR POPAT: Sorry, the better they are?</p> <p>22 <b>A. Yes. You are offering better protection by parking your</b></p> <p>23 <b>vehicles 200 metres plus away from living accommodation.</b></p> <p>24 THE CORONER: Better protection for the living accommodation</p> <p>25 that is if for example a vehicle that is 200 metres away</p> <p style="text-align: center;">Page 132</p>

33 (Pages 129 to 132)

1 detonates. I think what Mr Popat is asking particularly  
 2 about is what about the danger to other people who were  
 3 parking their vehicles in the same location?  
 4 **A. If you're monitoring the car park that shouldn't be an**  
 5 **issue.**  
 6 THE CORONER: Yes. All right, thank you.  
 7 MR POPAT: So if you are monitoring to see who is coming and  
 8 approaching the car park in the way that you would or  
 9 should be in any event monitoring any terrorists  
 10 approaching the camp.  
 11 **A. Yes.**  
 12 Q. And if the monitoring works then there isn't a risk or  
 13 it is a reduced risk?  
 14 **A. A reducing risk.**  
 15 THE CORONER: It means if the monitoring doesn't work what  
 16 it means is that somebody has got into your external car  
 17 park, that is the difference, isn't it?  
 18 **A. Yes, that's as far as they have got is the external**  
 19 **car park.**  
 20 THE CORONER: They haven't got inside what I am going to  
 21 call for these purposes the protected area, the living  
 22 area, that is the difference.  
 23 **A. That is the difference.**  
 24 MR POPAT: The difference in those circumstances is that  
 25 there is yet another gate for them to get through before  
 Page 133

1 they can get to the inner bit.  
 2 **A. If that's so, yes.**  
 3 Q. So if you take the situation we had at In Amenas, if you  
 4 put all the parking outside the outer gate and then had  
 5 some other gate at the front of that external car park,  
 6 so something completely different to the arrangement  
 7 that existed, presumably you would have to have  
 8 a perimeter fence?  
 9 **A. T bars would suffice, but, yes.**  
 10 Q. All the things that you have identified as appropriate  
 11 measures for the perimeter?  
 12 **A. Yes, we're talking about car parking.**  
 13 Q. Yes, but you'd have a car park which would potentially  
 14 be used by numbers of people who were at risk of this  
 15 sort of attack?  
 16 **A. Yes. Potentially, yes.**  
 17 Q. So you would have to have a number of measures put in  
 18 place around this external external car park with  
 19 a guard there and a checkpoint?  
 20 **A. Yes.**  
 21 Q. And beyond that you'd have the gate we do have which is  
 22 the outer gate?  
 23 **A. Yes.**  
 24 Q. And beyond that or rather inside of that you'd have the  
 25 inner gate that we do have?  
 Page 134

1 **A. Yes.**  
 2 Q. So that the benefit in the scenario that the coroner  
 3 just put to you would be that the person trying to get  
 4 into the living area, the part where the living  
 5 accommodation is, would have to get past the first gate?  
 6 **A. Yes.**  
 7 Q. And then the second gate and then the third gate?  
 8 **A. Quite right.**  
 9 Q. Whereas, as it was, assuming the outer barrier from the  
 10 chicane wasn't closed they would have to get beyond the  
 11 outer gate and the inner gate?  
 12 **A. Yes.**  
 13 Q. And that sort of proposal where you have got  
 14 a completely separate fenced off protected external  
 15 car park was not anything that anyone had recommended  
 16 for this location as far as you know?  
 17 **A. As far as I'm aware.**  
 18 Q. And wasn't something that you had identified in your  
 19 report?  
 20 **A. No.**  
 21 Q. Because what you are proposing on any analysis you could  
 22 have seen from the photographs was clearly different to  
 23 what was in place at In Amenas?  
 24 **A. No, because the photographs I have seen are very**  
 25 **unclear. So I wasn't sure where they were parking.**  
 Page 135

1 Q. Then the chicane gate, and by that I mean that barrier  
 2 at the front, it was said to you: well, shouldn't that  
 3 be closed? I think you said "obviously". Well, I mean,  
 4 obviously if you know there's an attack about to happen  
 5 you'd try and close the gate. That would go back to the  
 6 monitoring point we were discussing earlier?  
 7 **A. Yes.**  
 8 Q. If you can see that people are approaching then that  
 9 gate, that barrier would be another form of protection  
 10 and you would make sure it's closed?  
 11 **A. Yes.**  
 12 Q. But obviously if you have vehicles going through the  
 13 chicane that barrier would have to be lifted for them to  
 14 be able to exit?  
 15 **A. Yes. That outer barrier I suspect was designed for**  
 16 **night time to close the road off, I'm assuming.**  
 17 Q. That is in fact what Mr Fitzpatrick told us would  
 18 happen. At night time it would be closed off --  
 19 **A. Yes, that's what I would have thought.**  
 20 Q. -- and provide that protection.  
 21 What you have identified in your report, and just so  
 22 that I am clear about this, paragraph 4.5.1 of your  
 23 report, you say:  
 24 "Physical security measures deployed were consistent  
 25 with those that would be used at any oil or gas  
 Page 136

1 installation in a nonhostile safe environment."  
 2 **A. Mmm.**  
 3 Q. In any facility in Algeria in 2012/2013, the time up to  
 4 the attack, have you identified any location where these  
 5 various additional things, just to be clear as far as  
 6 the additional things are concerned, I think, I hope  
 7 this is a fair summary, the only thing you have really  
 8 identified is the external external car park and  
 9 possibly the solid wall?  
 10 **A. Mmm.**  
 11 Q. Sorry, and the lighting in the desert?  
 12 **A. Yes.**  
 13 Q. Are you aware of any facility in Algeria in the desert  
 14 during this time, and we know the hydrocarbon region  
 15 housed a number of oil and gas facilities and ventures,  
 16 are you aware of any having those additional measures  
 17 that you have identified?  
 18 **A. No.**  
 19 Q. You do identify the security management plan and  
 20 identified in the appendices, there are things that are  
 21 identified as recommendations and then seen from the  
 22 column on the right-hand side that some of those, at  
 23 least, weren't actioned, if that is the right word?  
 24 **A. That's correct.**  
 25 Q. I just want to understand what you actually say about  
 Page 137

1 those. The things that Mr Ritchie identified from that  
 2 list of recommendations that weren't in place were  
 3 sills, concrete sills to the base of the perimeter  
 4 fencing?  
 5 **A. That's correct.**  
 6 Q. Just so we understand that, I can't now remember which  
 7 of Mr Wigg, Mr Butt or Mr Fitzpatrick explained what  
 8 that was meant to mean, but one of them in any event  
 9 identified that that would be some sort of base for  
 10 every third upright which would provide additional  
 11 strengthening to the fence?  
 12 **A. No, you bury the fence in concrete at the bottom.**  
 13 Q. Yes, I think because the recommendation was every third  
 14 upright --  
 15 **A. No, that's a separate thing.**  
 16 Q. That is a separate one, right. So at the bottom of the  
 17 fence what you are interpreting that to mean is some  
 18 sort of concrete base?  
 19 **A. Yes.**  
 20 Q. So the fence sits into that base?  
 21 **A. Correct. Prevents it being lifted.**  
 22 Q. So we are clear, unless there is some evidence of  
 23 somebody trying to lift the fence up in this attack that  
 24 wouldn't really make much difference to anything.  
 25 Obviously it provides a greater protection against being  
 Page 138

1 lifted up?  
 2 **A. Yes, and it strengthens the fence.**  
 3 Q. So far as being able to break through the fence in the  
 4 absence of that concrete base underlying the fence, of  
 5 course the concrete T bars would be around it?  
 6 **A. Yes.**  
 7 Q. So that wouldn't provide any additional protection to  
 8 the concrete T bar barriers. Then --  
 9 **A. Can I just say the idea of the concrete base is to**  
 10 **actually prevent someone coming up to the fence and**  
 11 **climbing underneath it.**  
 12 Q. Yes.  
 13 **A. Which we know in this attack they didn't do, but the**  
 14 **reason they recommended it was for that very reason.**  
 15 Q. I think somebody explained it could be more easily  
 16 lifted up.  
 17 **A. Yes.**  
 18 Q. And obviously they could still cut through a fence but  
 19 if it was thought appropriate to try to tunnel through  
 20 the fence this would provide that sort of protection?  
 21 **A. Yes.**  
 22 Q. T bars to the CPF, a separate point but at the BdV there  
 23 were T bars all the way round?  
 24 **A. Yes.**  
 25 Q. Security alarm at the CPF. That was one of the things  
 Page 139

1 that had been identified as a recommendation, and we  
 2 have heard from witnesses, was in the process of being  
 3 installed at the CPF but hadn't been?  
 4 **A. No.**  
 5 Q. Initially the recommendation was for the BdV and the CPF  
 6 to have those intermittent security alarms?  
 7 **A. Separate alarms.**  
 8 Q. The BdV had been done but the CPF hadn't yet been done?  
 9 **A. Yes.**  
 10 Q. You may have read from one of the witnesses what he  
 11 described as the complexities of that system that needed  
 12 to be put in place?  
 13 **A. Yes.**  
 14 Q. But in any event, if the fire alarm sound that was  
 15 triggered in the CPF, which is the thing that may have  
 16 caused the confusion that Mr Ritchie identified to you,  
 17 if that was triggered by a shot to the generator as the  
 18 Statoil report identifies, that would have triggered the  
 19 fire alarm in any event?  
 20 **A. Possibly.**  
 21 Q. And then the final point that was identified from the  
 22 recommendations of turnstiles. I think these are the  
 23 pedestrian turnstiles so if somebody wanted to try and  
 24 get through the pedestrian gate if you had electronic  
 25 turnstiles you might provide a greater protection?  
 Page 140

<p>1 <b>A. Yes. There was an issue about CCTV coverage as well</b>  2 <b>that was supposed to be improved, but --</b>  3 Q. Do you agree with Mr Fulcher, therefore, when he was  4 asked about these recommendations in the tracking tables  5 that none of those that weren't in place at the time of  6 the attack would have made any difference to the outcome  7 of the attack?  8 <b>A. Not the outcome of the attack. The security alarm might</b>  9 <b>have improved the situation at the CPF if it sounded as</b>  10 <b>a security alarm and not a fire alarm.</b>  11 Q. If the fire alarm hadn't been triggered off in any  12 event?  13 <b>A. Yes.</b>  14 Q. Yes, I understand that. Thank you. You do say in your  15 report that, and you said something similar again today,  16 at page 41, that the lack of progress in implementing  17 the identified security enhancements demonstrates  18 security wasn't given adequate priority.  19 <b>A. Mmm.</b>  20 Q. Wouldn't you agree that that is speculation on your  21 part. You have no idea what the reasons were for any of  22 these particular measures not being progressed?  23 <b>A. No, I don't know why they weren't progressed.</b>  24 Q. You have mentioned in your report industry best  25 practice?</p> <p style="text-align: center;">Page 141</p>	<p>1 <b>assessments, not to physical protection measures.</b>  2 Q. Right. So we will just look at one of those fairly  3 briefly if we may. But if there aren't any industry  4 guidelines which say: look, this is what is recommended  5 for the industry, there is no question of anyone not  6 complying with them because they don't exist?  7 <b>A. No, no.</b>  8 Q. But insofar as they do exist or existed at the time the  9 only potentially relevant ones you have identified are  10 the ones that you have provided with your report; is  11 that right?  12 <b>A. Yes.</b>  13 Q. Do you have those?  14 <b>A. Not with me here, no.</b>  15 Q. There is a bundle which has been very helpfully put  16 together which is called the expert bundle for  17 Mr Braziel. (Handed) Sir, if you have the same bundle?  18 <b>A. Yes.</b>  19 Q. Behind divider 8, Mr Braziel.  20 <b>A. Bear with me. I have the document now.</b>  21 Q. October 2004. Security vulnerability assessment  22 methodology for petroleum and petrochemical industries  23 produced by the American Petroleum Institute. Can  24 I take you to just a couple of things in it, more than  25 a couple of things but a few things in it. If you turn,</p> <p style="text-align: center;">Page 143</p>
<p>1 <b>A. Yes.</b>  2 Q. And that can take the form of course of what the  3 industry does, so what other oil and gas facilities do?  4 <b>A. Yes.</b>  5 Q. We have talked about those and in Algeria you have  6 explained the position as you understand it for the  7 other facilities.  8 <b>A. Yes.</b>  9 Q. But of course it can take the form of guidelines that  10 apply to the industry?  11 <b>A. Yes.</b>  12 Q. Industry best practice can come in the form of  13 guidelines saying: this is what we recommend should be  14 done and what should be in place?  15 <b>A. Yes.</b>  16 Q. I am not sure I have entirely understood your position  17 on the guidelines. In one part of your report you  18 appear to be saying there weren't any guidelines but in  19 another part you do identify and produce very helpfully  20 a couple of documents which are detailing the security  21 assessments for the petrochemical industry?  22 <b>A. What there is not within the industry is an industry</b>  23 <b>standard for the physical security protection of oil and</b>  24 <b>gas facilities and the documents I have provided, the</b>  25 <b>American documents I provided, refer to risk</b></p> <p style="text-align: center;">Page 142</p>	<p>1 please, to page 1 of the actual document, a few pages  2 in.  3 <b>A. Yes.</b>  4 Q. Towards the bottom we have a number of bullet points.  5 What the guidance says is that to carry out  6 effectively -- I am going to paraphrase this and see if  7 this is correct as a summary, Mr Braziel -- it says:  8 carry out an assessment of your security  9 vulnerabilities?  10 <b>A. Yes.</b>  11 Q. And in order to do that do the sorts of things that are  12 identified here in these bullet points. Characterise  13 the facility and what needs to be secured, identify and  14 characterise threats against those assets, evaluate  15 those threats, identify potential vulnerabilities,  16 determine risk presented by these things and the  17 consequences if they occur, rank the risk, make  18 recommendations for lowering the risk and identify and  19 evaluate the risk mitigation options.  20 So in broad terms those are the sorts of things that  21 should be being done?  22 <b>A. Yes.</b>  23 Q. And as it says over the page, under the heading  24 "Security vulnerability assessment and security  25 management principles", if you pick up the paragraph</p> <p style="text-align: center;">Page 144</p>

36 (Pages 141 to 144)

1 just above the four numbered points, the paragraph above  
 2 that says:  
 3 "SVAs [which are security vulnerability assessments]  
 4 are not necessarily a quantitative risk assessment but  
 5 usually performed qualitatively using the best judgment  
 6 of the SVA team."  
 7 So don't just do a sort of numbers exercise, use the  
 8 judgment of the experts who are involved?  
 9 **A. Yes, correct.**  
 10 Q. And then it identifies that you can't completely prevent  
 11 all security risks but employ the strategies to deter,  
 12 detect, delay and respond?  
 13 **A. Correct.**  
 14 Q. That point is made again over the page, just pick it up  
 15 in one place, under the heading "Risk definition for  
 16 SVA", third paragraph down:  
 17 "A security event is normally estimated  
 18 qualitatively based on the consensus and judgment of  
 19 a team of knowledgeable people as to how the likelihood  
 20 and consequences of an undesired event scenario compares  
 21 to other scenarios."  
 22 The best available information?  
 23 **A. Correct.**  
 24 Q. So in broad terms that is what is being recommended as  
 25 the approach for carrying out assessments of your  
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1 security measures and what's needed?  
 2 **A. Yes.**  
 3 Q. And that is exactly the arrangement that was in place at  
 4 In Amenas?  
 5 **A. Yes.**  
 6 Q. There were expert people who carried out exercises of  
 7 judgment, put together plans based on risks and threats  
 8 as they perceived them to be and identified measures  
 9 that would be appropriate to guard against those risks,  
 10 yes?  
 11 **A. Yes.**  
 12 Q. Now, in the document we have some guidance to help with  
 13 the carrying out of risk assessments, which you can just  
 14 see picking it up, the page numbering at the top left,  
 15 page 28, "Risk Analysis/Ranking", and then some detail  
 16 there, but you see at the bottom of the page  
 17 a description of this step of carrying out the risk  
 18 assessment which is to estimate risk of successful  
 19 attack and then various things identified on the  
 20 right-hand side and then prioritise risks accordingly.  
 21 You see how that's to be set out in a risk ranking  
 22 matrix on the next page which is the sort of matrix  
 23 which was put together with the different risk  
 24 assessments that were produced by the JV and in fact by  
 25 BP as well?  
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1 **A. Yes, standard practice.**  
 2 Q. If you go on, please, to page 31 we have attachment 1,  
 3 example SVA methodology forms, and then what follows  
 4 beyond that there are a number of forms and as part of  
 5 the overall appendices it is appendix B which begins at  
 6 page 45, you have a table of contents which identifies  
 7 those counter measures that are to be included in the  
 8 check lists which the form that precede it identify  
 9 should be taken into account?  
 10 **A. Yes.**  
 11 Q. We just see -- we don't need to go through all of them,  
 12 but just seeing the contents page on page 45 it  
 13 identifies various things including physical measures  
 14 such as perimeter barriers, fences, gates, building  
 15 barriers, intrusion detection, CCTV and so on?  
 16 **A. Yes.**  
 17 Q. All measures that are identified in the guidelines as  
 18 being things you do take into account and just by way of  
 19 example, so far as fences are concerned, it does give  
 20 more detail, doesn't it? You said a moment ago there  
 21 wasn't much detail about the physical security measures,  
 22 but if you go on, I am afraid -- it is page number 52 at  
 23 the top.  
 24 **A. Okay.**  
 25 Q. Here are all sorts of things that need to be taken into  
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1 account when deciding on the type of fence you are going  
 2 to have and the type of gate, type of lighting, vehicle  
 3 barriers and the like?  
 4 **A. Yes.**  
 5 Q. So this guidance, 2004, identifies these various factors  
 6 and says: you carry out your assessment and take into  
 7 account whether it is a 6-foot chain link fence in which  
 8 case you have got low protection or is it an 8-foot chain  
 9 link fence which provides greater protection and the  
 10 like.  
 11 **A. Yes.**  
 12 Q. Now, keeping that page open, please, if you just pick up  
 13 the core bundle, which is the green bundle and turn,  
 14 please, to divider 19, this is a document which was  
 15 produced by the liaison team and the liaison team  
 16 witnesses explained at least to a little extent what it  
 17 involved. But is this exactly the sort of thing that's  
 18 identified in the guidance that should be being carried  
 19 out by way of a vulnerability assessment to pick up the  
 20 sorts of measures that should be in place?  
 21 **A. Yes.**  
 22 Q. It identifies the areas of concern, the primary function  
 23 of the vehicle barrier. The first page deals with the  
 24 perimeter fence and explains a number of things which  
 25 are taken into account rather in the same way as the  
 Page 148

1 guidance document on the page we have just looked at  
 2 says you should take into account?  
 3 **A. Yes.**  
 4 Q. So it identifies the sort of construction of the fence  
 5 that might be appropriate and the sorts of things that  
 6 might create problems. If you look, if this helps you,  
 7 if you turn to page 214?  
 8 **A. Yes.**  
 9 Q. It deals with fences, includes in the middle column at  
 10 the bottom, environmental considerations, designed to  
 11 prevent -- this is item 3 -- designed to prevent the  
 12 build-up of sand, steel mesh or quality link are  
 13 preferable. I won't take you through all of this. You  
 14 see on the left-hand side the next entry on page 215,  
 15 secondary function of double fencing:  
 16 "Create a sterile area outside of the facility  
 17 demarcation line where guards can patrol without  
 18 exposure to external dangers."  
 19 So the guidelines that existed were, would you agree  
 20 with this, at least on the face of the documents,  
 21 followed and applied so that assessments of the type  
 22 that are identified in the guidelines were carried out?  
 23 **A. Yes.**  
 24 Q. They included looking at things in the sort of detail  
 25 identified in the guidelines in relation to fences and  
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1 gates and barriers?  
 2 **A. Yes.**  
 3 Q. And on the basis of those assessments undertaken by  
 4 experienced people carrying out qualitative judgments  
 5 recommendations were made? 6  
 6 **A. In 2007.**  
 7 Q. In 2007, yes, in that document but we have seen the  
 8 security management plans continuing year on year,  
 9 haven't we?  
 10 **A. Yes.**  
 11 Q. Yes?  
 12 **A. Yes but not to that detail.**  
 13 Q. Not to which detail?  
 14 **A. This qualitative assessment you refer to.**  
 15 Q. I see, the document --  
 16 **A. This one.**  
 17 Q. -- that we have at divider 19, yes?  
 18 **A. This document was done in 2007. I have seen no evidence**  
 19 **that it was revisited.**  
 20 Q. As a document as it stands, no.  
 21 **A. Yes.**  
 22 Q. What you have seen is a number, and I don't know exactly  
 23 how many you have seen, of what are called security  
 24 reviews?  
 25 **A. I saw two.**  
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1 Q. Two. We were told they were produced initially I think  
 2 on four times a year and then twice a year, security  
 3 management plans on an annual basis, ad hoc  
 4 communications saying: do this, do that?  
 5 **A. Yes.**  
 6 Q. And weekly updates or summary documents which identified  
 7 risks that had been identified and provided instructions  
 8 for different things to happen?  
 9 **A. Mmm.**  
 10 Q. And handover notes prepared by the back-to-back of  
 11 whichever liaison supervisor was leaving?  
 12 **A. Yes.**  
 13 Q. Which again set out all the things that may have been  
 14 occurring at the camp and included a number of things  
 15 that were identified as things that needed to be done?  
 16 **A. Yes.**  
 17 Q. You said in the context of the consideration of the risk  
 18 management system, and I put that generally because it  
 19 includes security management plans and it includes risk  
 20 assessments, Risk Action Plans, the reviews, the weekly,  
 21 monthly annual reviews and the like, you said in  
 22 relation specifically to the risk assessment that they  
 23 were actually flawed?  
 24 **A. Yes.**  
 25 Q. And the point that was being put to you and you accepted  
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1 was if you look at the JV risk assessment -- do you have  
 2 it there? Which bundle do you have it? You have it in  
 3 the core bundle. It doesn't matter. It is in a couple  
 4 of places. The JV risk assessment, page 4? 5  
 5 **A. 2012.**  
 6 Q. If you just put all of these things in the risk column  
 7 then you are not getting an assessment for each  
 8 individual item and taking account of the differences in  
 9 the probability or impact of any of those individual  
 10 items?  
 11 **A. No, you're not.**  
 12 Q. It is a standard form of risk assessment, isn't it,  
 13 Mr Braziel?  
 14 **A. Well it's not one I would use.**  
 15 Q. Are you seriously suggesting that you'd carry out some  
 16 sort of quantitative assessment of each single item that  
 17 you might identify?  
 18 **A. Absolutely.**  
 19 Q. And if you did --  
 20 **A. And have done recently.**  
 21 Q. If you did that, you would, I am assuming what you are  
 22 saying, get different figures for each of these  
 23 different items?  
 24 **A. Yes.**  
 25 Q. What was said to you was well if you mix up the risks  
 Page 152

<p>1 and let us say you take into account the risks of SAMs 2 being launched at aeroplanes that might have a very low 3 probability, obviously a high impact? 4 <b>A. Yes.</b> 5 Q. That might make a difference to your assessment? 6 <b>A. Yes.</b> 7 Q. If you look at the impact figure it is the highest it 8 can be, 5? 9 <b>A. Yes.</b> 10 Q. If you look at the probability figure it is the second 11 highest it can be, 4? 12 <b>A. Yes.</b> 13 Q. Would you at least agree with this that whichever way 14 you did this exercise you are not likely to get very 15 different figures from the highest you can get for 16 impact and the almost highest you can get for 17 probability? 18 <b>A. No.</b> 19 Q. You also said, well I don't know how frequently this was 20 reviewed or updated. Whilst the document itself, the 21 risk assessment document may not have been updated more 22 than once a year, there were continuing assessments of 23 risk at the site, weren't there, on a weekly basis, we 24 have seen the weekly summaries assessments? 25 <b>A. There were documented assessments in that respect, yes.</b></p> <p style="text-align: center;">Page 153</p>	<p>1 was operating to? 2 <b>A. Yes.</b> 3 Q. So low to medium, medium, whatever it might be? 4 <b>A. Yes.</b> 5 Q. On a weekly basis? 6 <b>A. Mmm.</b> 7 Q. That set out what the level was? 8 <b>A. Yes.</b> 9 Q. On a weekly basis, didn't it? 10 <b>A. That was the liaison team's assessment. What we don't 11 know is had management signed off to that as the 12 accepted level.</b> 13 Q. Just because I think it probably fits in this context 14 when talking about civil crisis plan, did I understand 15 you correctly to say if, for example, there had been 16 a threat of the type I think Ms Dolan put to you on the 17 day before the attack, and obviously not looking with 18 hindsight knowing the attack occurred, did I understand 19 you correctly to say, well because that threat was made, 20 if it was made, and assuming it had been translated and 21 understood, that would have required immediate demanning 22 of the site? 23 <b>A. No, that's not what I said at all.</b> 24 Q. Right. I genuinely wanted to understand what you said. 25 THE CORONER: I think he may have said that the first step</p> <p style="text-align: center;">Page 155</p>
<p>1 Q. Monthlies, six monthly? 2 <b>A. Yes.</b> 3 Q. Annually with a security management plan? 4 <b>A. Mmm.</b> 5 Q. If you -- I don't know if you remember it, if you want 6 to see it we can go to it again, in the event of 7 incidents or events such as the French intervention in 8 Mali a specific one-off email or communication saying, 9 well, in light of that we think this, this and this? 10 <b>A. Mmm.</b> 11 Q. So whether or not a particular document was updated 12 there were assessments of risk on an ongoing basis? 13 <b>A. Yes.</b> 14 Q. The system also included the civil crisis plan? 15 <b>A. That's correct.</b> 16 Q. Which again is a component of the security management 17 system overall that you'd expect to see? 18 <b>A. Yes.</b> 19 Q. And it was present? 20 <b>A. Yes again, that was written once a year or updated once 21 a year. So any input from any of these other documents 22 you referred to is not reflected where it can be 23 singularly found and actioned.</b> 24 Q. Each weekly summary which was produced by the liaison 25 team had at the top of it the risk level that the site</p> <p style="text-align: center;">Page 154</p>	<p>1 would be to see whether the military would be prepared 2 to step up security. 3 <b>A. Quite right, sir.</b> 4 THE CORONER: But if they wouldn't, then you might go to -- 5 I think, let's just see. That is my recollection, is 6 that it? 7 <b>A. That's correct.</b> 8 MR POPAT: So you would see if the military would step up 9 and by that you mean to provide some sort of -- 10 <b>A. Perimeter security, some firm physical security.</b> 11 Q. And if they didn't? 12 <b>A. Then you would have to consider whether you would keep 13 your people on site or not because you were exposing 14 them to risk if you didn't.</b> 15 Q. Risk based on a threat which is made? 16 <b>A. Yes.</b> 17 Q. How would you determine when to bring them back if that 18 were appropriate? 19 <b>A. Again, you'd have to risk assess that.</b> 20 Q. What you say in your report, page 31, in connection with 21 all of this, is that you would expect the JV management 22 to have processes in place -- sorry, have you found it, 23 page 31? 24 <b>A. Yes.</b> 25 Q. That you would expect the JV management to have</p> <p style="text-align: center;">Page 156</p>

1 processes in place for regular liaison meetings and to  
 2 be more proactive in forming closer working  
 3 relationships with the military and Gendarmes to  
 4 understand their capabilities and level upon which the  
 5 JV could rely upon them?  
 6 **A. Quite.**  
 7 Q. You obviously wrote that part of your report before the  
 8 evidence that's come out in the course of the inquest?  
 9 **A. Indeed.**  
 10 Q. You are aware from that evidence that generally there is  
 11 a limit to the exchanges of information between the  
 12 Algerian military or the Gendarmes and anyone at the  
 13 facility?  
 14 **A. Yes.**  
 15 Q. But you are also aware that there was a process in  
 16 place, as you described it, for regular contact with the  
 17 Gendarmes and that was the process in place which  
 18 employed the liaison team and identified them by  
 19 contract as the single point of contact for the contact  
 20 with the military, yes?  
 21 **A. Correct, yes.**  
 22 Q. So that was the sort of process you were saying should  
 23 be in place?  
 24 **A. Indeed it was.**  
 25 Q. And you say you would expect them to form close working

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1 relationships with the military and Gendarmes to  
 2 understand their capabilities. Just so far as the close  
 3 working relationships are concerned, so far as the  
 4 Gendarmes are concerned, you would have read  
 5 Mr Fitzpatrick's evidence now, this was Day 8, page 59?  
 6 **A. Yes.**  
 7 Q. In which he says:  
 8 "We had a very close relationship, Paul and myself,  
 9 with the Gendarme and would speak on a daily basis. So  
 10 the relationship never changed and the information  
 11 sharing never changed during that time."  
 12 **A. Fine.**  
 13 Q. And that's the sort of relationship you would expect?  
 14 **A. Yes, and I accept that that's now available.**  
 15 Q. What you do say is that the overall assessments that  
 16 were undertaken were flawed, and you have repeated this  
 17 at least in part?  
 18 **A. Yes.**  
 19 Q. Because they were based on an assumption underlying all  
 20 of that that the military would prevent an armed attack  
 21 upon the facility?  
 22 **A. Yes.**  
 23 Q. You do say that management should have been more  
 24 proactively engaged with the military but I assume from  
 25 your last answers you accept that insofar as the JV

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1 could be engaged with the military that was --  
 2 **A. Yes.**  
 3 Q. You are also aware that the liaison team say,  
 4 Mr Fitzpatrick in particular, that he saw drills being  
 5 carried out by the Gendarmes at their own camp and at  
 6 least, as I said to you before, one drill where they  
 7 approached the camp?  
 8 **A. Yes.**  
 9 Q. And you are aware from Mr Wigg's evidence and Mr Butt's  
 10 evidence that they had contact with the local military  
 11 to the extent that they could?  
 12 **A. Yes.**  
 13 Q. Now, when you say it's an unsubstantiated assumption  
 14 that the military could prevent the attack, can I just  
 15 ask you to consider what that assumption, if there was  
 16 an assumption of that sort, may in fact have been based  
 17 on. We have that level of liaison with the Gendarmes  
 18 and the military in which, as Mr Fitzpatrick explained,  
 19 he saw them, he saw what they were like, how  
 20 professional they were, the sort of equipment and  
 21 weaponry they had, yes?  
 22 **A. Yes.**  
 23 Q. That is a form of assessment, isn't?  
 24 **A. Yes, it is.**  
 25 Q. And it is not me or somebody from this side of the court

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1 carrying out that sort of assessment, it is a military,  
 2 an ex-military person who is employed as a security  
 3 expert who will be carrying out that sort of liaison.  
 4 So there is that sort of assessment of the ability  
 5 and the equipment and suitability of the Gendarmes to  
 6 carry out a response?  
 7 **A. Correct.**  
 8 Q. There is the observation of drills and to whatever  
 9 extent he observed it, patrols being carried out by the  
 10 Gendarmes.  
 11 So far as the military more generally is concerned,  
 12 of course they didn't obtain from the military details  
 13 of the exact numbers or troops or equipment or  
 14 operational tactics or strategy that the military had or  
 15 would deploy. And you wouldn't expect anyone to be in  
 16 a position to obtain that from a sovereign state, would  
 17 you?  
 18 **A. No. What I might want to know is where they were in  
 19 relation to my facility though.**  
 20 Q. So you might want to know, at least broadly whereabouts  
 21 they are within the militarised zone?  
 22 **A. Yes.**  
 23 Q. And elsewhere. What you had in this case was one, an  
 24 expectation that they would act and be sufficient to do  
 25 what was necessary to protect a facility like In Amenas

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<p>1 because of its importance to the economy and the 2 Algerian state? 3 <b>A. Yes.</b> 4 Q. That was the sort of point that Ms Dolan put to you, you 5 would have that expectation and it is not an 6 unreasonable expectation because it is based on the 7 knowledge of how important this facility is to the 8 state? 9 <b>A. Yes.</b> 10 Q. And knowledge that the state through its military and 11 through the military personnel have stated that they 12 recognised the importance of protecting expats and 13 facilities like this, yes? 14 <b>A. Yes.</b> 15 Q. You have history as a basis for an assumption. As 16 Dr Spencer explained there is no account over many years 17 during which Algeria was subjected to regular brutal 18 acts of terrorism of attacks being perpetrated or being 19 allowed to be perpetrated on oil and gas facilities in 20 southern Algeria, yes? So you would have that as 21 a basis for your thinking? 22 <b>A. Yes.</b> 23 Q. You have the liaison and what is understood and observed 24 and assessed by those experts liaising with the Gendarme 25 and the military, and that forms your assessment, yes?</p> <p style="text-align: center;">Page 161</p>	<p>1 perpetrators of bad acts, yes? 2 <b>A. Yes.</b> 3 Q. So you have all of that which you can see and which is 4 being looked at and being assessed to inform the basis 5 of the assumption that the military would and could 6 protect against an attack of this sort? 7 <b>A. That's your interpretation, not mine.</b> 8 THE CORONER: Sorry, can I just understand, I think what you 9 said is what you would want to know is whereabouts they 10 were in relation to your facility, I think that's how 11 you put it. 12 <b>A. Yes, if you've deployed a large number of Algerian 13 military in the hydrocarbon region and it was a large 14 number, but where were they?</b> 15 THE CORONER: That's what I was -- do you mean how far away 16 they were? 17 <b>A. Yes.</b> 18 THE CORONER: How many there were? How long it would take 19 to get to you? Is that the sort of thing you mean? 20 <b>A. Yes, indeed that sort of knowledge, sir.</b> 21 THE CORONER: If someone said it will be about an hour that 22 would be one thing, wouldn't it? 23 <b>A. Yes or it might be half an hour or it might be tomorrow. 24 You just don't know.</b> 25 THE CORONER: I just wanted to see what you meant by that,</p> <p style="text-align: center;">Page 163</p>
<p>1 <b>A. Well, with the Gendarmes anyway. I'm still not 2 convinced that we know what the military were doing.</b> 3 Q. You have, because we have seen it in the different 4 materials, information from a variety of third party 5 sources. You mentioned making contact with embassies 6 and the like. We are told at least that that is exactly 7 the sort of thing that did happen. There were contacts 8 with the embassies so that information could be obtained 9 from the embassies, from the defence attaches as to what 10 they had identified? 11 <b>A. Mmm.</b> 12 Q. You have assessments being carried out of media sources, 13 yes? 14 <b>A. Yes.</b> 15 Q. You have independent risk consultancies providing 16 reports to the liaison team, to BP, in fact also to 17 Statoil with their own assessments? 18 <b>A. Yes.</b> 19 Q. And you have as the basis of this assumption that the 20 military would protect and be able to protect knowledge 21 of the, what I call the successes of the military, both 22 at border level and within the militarised zone which 23 have been reported throughout the papers of the military 24 picking up potential terrorists and seizing them, 25 picking up weapons caches, picking up potential</p> <p style="text-align: center;">Page 162</p>	<p>1 right. Sorry, Mr Popat. 2 MR POPAT: Can I just pick up on that just so we understand 3 it? 4 THE CORONER: Yes, of course. 5 MR POPAT: I thought, perhaps mistakenly, that you thought 6 one of the functions of the military and the militarised 7 zone was not the ability to get to the site of the 8 attack alone, which of course is one factor you would 9 take into account, but also how militarised the zone was 10 so that they would be able to pick up potential 11 terrorists? 12 <b>A. Yes, quite.</b> 13 Q. So the fact that they may be an hour away from your site 14 may not be a problem. 15 <b>A. No.</b> 16 Q. It may be a good thing because it means you are 17 potentially picking these people up further away? 18 <b>A. Quite so.</b> 19 Q. Of course it would be a factor to be taken into account 20 when considering how quickly would the military be able 21 to get to the site and support the Gendarmes if that 22 were necessary to do so. But that is the sort of 23 information you would expect to want to have? 24 <b>A. Yes.</b> 25 Q. And that would include, for example, knowledge of</p> <p style="text-align: center;">Page 164</p>

<p>1 checkpoints in the militarised zone, locations of 2 military camps --</p> <p>3 <b>A. Probably.</b></p> <p>4 Q. -- in the militarised zone, where they were?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. Ultimately did I understand your evidence correctly, 7 that what you were saying was: okay, they all work on 8 the basis of this assumption that the military would be 9 able to prevent or protect against an attack of this 10 scale. Just to be clear about that, because you don't 11 think that they were proceeding on the basis that the 12 military would be able to stop any single terrorist 13 getting to the camp?</p> <p>14 <b>A. Unlikely.</b></p> <p>15 Q. Because they obviously identified that as a potential 16 risk that could occur?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. And they put in measures to try and guard against that. 19 But because they assumed the military was able to and 20 would protect against this sort of scale of attack, 21 approaching the gates of the camp, you say what should 22 have been done is to make sure there were armed 23 Gendarmes at the gates of the camp effectively, wherever 24 they were but around there?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 165</p>	<p>1 MR POPAT: I said I would give you the reference when I was 2 asking you questions and that's it. Thank you.</p> <p>3 Questions from MR LAIDLAW</p> <p>4 MR LAIDLAW: Mr Braziel, my name is Laidlaw and I appear for 5 Statoil. One specific area and then a more general 6 topic for you. As to the specific matter it may be it 7 is something that you already dealt with with Mr Popat 8 so just bear with me if it is repetitious.</p> <p>9 Can I take you, please, to the report and give you 10 a reference. The context is your discussion of the 11 physical security measures at 4.5 in your report. That 12 passage begins at page 37.</p> <p>13 <b>A. Yes, I have that.</b></p> <p>14 Q. Then at 4.5.2.1 over the page at 38 you begin to deal 15 with the upgrades which were for one reason or another 16 not implemented at the time of the attack. Then if 17 I take you forward, please, to the conclusion of this 18 section of the report to page 41; this is a passage you 19 have just been taken to, the second paragraph down you 20 wrote:</p> <p>21 "In my professional opinion the continued lack of 22 progress in implementing the identified security 23 enhancements demonstrates that security was not given 24 adequate priority."</p> <p>25 You have agreed with Mr Popat that that observation</p> <p style="text-align: center;">Page 167</p>
<p>1 Q. Sir, would you forgive me one moment while I just check 2 a reference. (Pause)</p> <p>3 THE CORONER: More than a moment if you want it.</p> <p>4 MR POPAT: No, Mr Antrobus has found what I was looking for 5 before I knew I wanted it.</p> <p>6 I was saying to you that in your report it appeared, 7 certainly to me, that you were aware of the layout in 8 the car parking arrangements at the BdV and the 9 reference, I think, or one of the references at least, 10 you can see from 4.6.1, that is page 41.</p> <p>11 <b>A. Yes, I have that.</b></p> <p>12 Q. You are dealing with here unarmed security guards but 13 you set out a quote from the statement of Mr Wigg and 14 right at the bottom of the page the sentence begins: 15 "On the BdV there is initially an entrance point. 16 This is a chicane followed by a gate to the car park 17 which is usually open." 18 And then you go on to talk about the car park area. 19 So I am not suggesting that you were saying anything 20 that wasn't true, Mr Braziel, at all, but when you 21 prepared this report at least you had sight of 22 a statement which explained the arrangement whereby the 23 car park that we are talking about is beyond the outer 24 gate?</p> <p>25 <b>A. Yes, I accept that.</b></p> <p style="text-align: center;">Page 166</p>	<p>1 involved on your part a degree of speculation because 2 you couldn't know what the reasons were for 3 implementation or not. Now in a similar vein would you 4 also agree that you'd have to be careful before reaching 5 a conclusion that any of those enhancements had they 6 been in place would have made any meaningful difference 7 to outcome?</p> <p>8 <b>A. You're probably correct.</b></p> <p>9 Q. Then just looking please at the next paragraph down 10 which is a slightly different topic, because this takes 11 you back to an earlier passage, as you know, in the 12 report and this was your sort of, as it were, best case 13 scenario for layers of protection?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. It is a similar question. Again, I would suggest that 16 even with by way of example a hardened perimeter of the 17 sort that you discuss earlier in your report you have to 18 be careful before reaching a conclusion that even had 19 that been in place that would have made a meaningful 20 difference to what occurred.</p> <p>21 Can I explain why before you address the proposition 22 so you can have that in mind?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. We are dealing here, aren't we, with a very large 25 attacking group?</p> <p style="text-align: center;">Page 168</p>

1 **A. Yes.**  
 2 Q. We are dealing with a very well organised group?  
 3 **A. It would appear that way.**  
 4 Q. Well equipped and I think it is probably sensible also  
 5 to assume that apart from those levels of sophistication  
 6 there is a good deal of planning that had gone into this  
 7 attack?  
 8 **A. Yes, I would have thought so.**  
 9 Q. And it is that, as it were, that picture, which leads me  
 10 to suggest for your consideration that even had there  
 11 been a hardened perimeter that would have made no  
 12 meaningful difference to outcome?  
 13 **A. It may have delayed the attack slightly.**  
 14 Q. Yes, but with a group who have got explosives by way of  
 15 example, one can see why with that degree of  
 16 sophistication they may just adapt the method of attack?  
 17 **A. Indeed they may, indeed they may.**  
 18 Q. The second more general topic is this, please: as we  
 19 have seen in your report, you draw attention to and you  
 20 reference at various points a number of the findings  
 21 that the Statoil investigation team and in expressing  
 22 your overall views there would seem to be little between  
 23 you and they as to broad conclusions. Is that right?  
 24 **A. It may well be so.**  
 25 Q. If I take you to the report so you can just glance  
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1 through a summary of the conclusions reached as they  
 2 touch upon security. You have this, if you haven't got  
 3 it loose, in core 2 at divider 8. I know that you have  
 4 read this carefully before but let me just bring the  
 5 broad conclusions back to mind.  
 6 **A. Yes.**  
 7 Q. If you turn in the internal numbering to page 4 that may  
 8 be numbered 345 if I have correctly transferred the  
 9 bundle numbering.  
 10 **A. Yes.**  
 11 Q. Just glance down. You don't need to read it in any  
 12 detail, but take your time if you need it, but the main  
 13 conclusions as they touch upon security are at 151 and  
 14 152 and then do you recall that there are various  
 15 observations which begin halfway down that page?  
 16 **A. Yes, I do.**  
 17 Q. And if you turn the page, please, to page 5 you can see  
 18 they continue as they bear upon security issues?  
 19 **A. Yes.**  
 20 Q. -- down almost to the bottom of the following page?  
 21 **A. Yes.**  
 22 Q. It is that that I had in mind when I made the suggestion  
 23 that there appeared to be little between you and they as  
 24 to broad security conclusions.  
 25 **A. I think it's less to do with conclusions, more following**  
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1 **a theme of starting with the military and working down**  
 2 **through the various sections. My conclusions are my**  
 3 **own.**  
 4 Q. Yes, I know, I wasn't suggesting for a moment because  
 5 something had been said here you were necessarily going  
 6 to agree with it.  
 7 **A. The very first document I ever read was this document so**  
 8 **based upon that you will find that some of my paragraphs**  
 9 **actually follow in sequence because it's a natural**  
 10 **sequence to follow.**  
 11 Q. We can all understand why you begin with that document.  
 12 It is a very helpful introduction. But back to the  
 13 point I am making.  
 14 **A. Yes.**  
 15 Q. Or am seeking to make if you agree with it of course.  
 16 **A. Okay.**  
 17 Q. In terms of main conclusions you and they, independent  
 18 of each other, appear to have reached the same broad  
 19 conclusions?  
 20 **A. I would think that is probably so.**  
 21 Q. Is it your view that this is a well written, well  
 22 informed piece of work?  
 23 **A. Oh it is.**  
 24 MR LAIDLAW: That is all from me, thank you.  
 25 Further questions from MR RITCHIE  
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1 MR RITCHIE: Sir, there is one matter I would like to  
 2 clarify if I am granted the time to do so.  
 3 THE CORONER: Yes.  
 4 MR RITCHIE: I am grateful.  
 5 Mr Braziel, it was put to you that none of the  
 6 liaison team had recommended external parking and  
 7 I would just like to clarify the evidence on that for  
 8 you. Mr Fitzpatrick, Day 8, page 172.  
 9 "Question: Can we discern from this when it was  
 10 that the advice was given and accepted that motorized  
 11 vehicle sliding gates should be installed on all main  
 12 entrances?  
 13 "Answer: Okay, that's a little harder because the  
 14 whole entrance design/car park area into the BdV didn't  
 15 actually follow the recommendations that we had put  
 16 forward. So typically what had happened is we had made  
 17 a set of recommendations, the JOC had chosen to do  
 18 something different so then when it went to a detailed  
 19 study with engineers there are a number of compromises  
 20 that had to be made. So for example, the electronic  
 21 access control system, ie the big turnstiles and  
 22 proximity keys and so on had been accepted by the JOC.  
 23 We had bought it. It was in the warehouse ready to be  
 24 implemented but the BdV entrance upgrade happened whilst  
 25 that was in the warehouse. So therefore there had to be  
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1 a number of amendments and changes made because we  
 2 weren't building it with electronic access control.  
 3 Does that make sense?  
 4 "THE CORONER: When had the BdV entrance  
 5 upgrade happened?  
 6 "Answer: That happened around 2010 I think.  
 7 MS DOLAN: Can you help us with how long  
 8 these gates had been in the warehouse?  
 9 "Answer: We bought them in, I think it was approved  
 10 in -- JOC approval was about 2008 and I think we bought  
 11 them in 2009. So it would have been 2009."  
 12 Mr Wigg, this is Day 8, page 240.  
 13 "Question: It relied on physical objects?  
 14 "Answer: Okay, so the recommendation in place was  
 15 that vehicles should all be parked externally and the  
 16 gate and the chicane remained permanently locked. Now,  
 17 that wasn't JOC approved for the BdV but it was JOC  
 18 approved for the CPF and IBO.  
 19 "Question: But it wasn't for the BdV?  
 20 "Answer: The BdV preferred to have what they  
 21 described as -- this is JOC not liaison -- what they  
 22 described as an outer inner parking area, which is what  
 23 you see. So you come in the external perimeter and  
 24 there is a car park and there is another gate to get  
 25 through. So what our recommendation was that that outer  
 Page 173

1 protection should be at the entrance to BdV not at the  
 2 entrance to the car park, if that makes sense."  
 3 And then finally Garry Butt, Day 16, page 28:  
 4 "Question: Can you say for the purposes of this  
 5 question we have heard a lot already at the inquest  
 6 about the reliance on military protection zone, the  
 7 border protection zone and the Gendarmes, I'm interested  
 8 in when those haven't worked and we are talking about  
 9 the risk being terrorist attack at the In Amenas site,  
 10 so they've got through all those outer layers of  
 11 protection, what were the measures that were this place  
 12 to manage the risk of somebody getting to the site?  
 13 "Answer: You have to go back to 2006 because again,  
 14 I already spoken about the format for the security  
 15 management plan. At the time in 2006 the plan was  
 16 formalised and then it was -- we were looking at a way,  
 17 or the people who were doing my job and are in the BP  
 18 side of it, looking at a way of how we are going to  
 19 manage security. Now this dated from people, a lot of  
 20 the guys had been working in Algeria, also a lot of people  
 21 who had been working in Iraq for example. So there was  
 22 experience coming back that the threats were evolving,  
 23 we were having like VBIED suicide vehicle bombs et  
 24 cetera et cetera.  
 25 "At this point each site was assessed, the security  
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1 measure each site was assessed, and we came up with  
 2 a set of recommendations at the end of 2007 -- sorry, at  
 3 the end of 2006, start of 2007 there was a list of  
 4 recommendations concerning things like chicanes,  
 5 concrete T bars around the perimeters, external parking,  
 6 security alarms et cetera et cetera.  
 7 "Now the idea of these and the premise at  
 8 this time was that these measures would be put  
 9 in place but in the event that we had an attack  
 10 where we were protected by the Algerian  
 11 military or Gendarmes, which was the first line  
 12 of defence at the base itself, all these  
 13 measures we put in place would act as delaying.  
 14 They would slow down any attack. They weren't  
 15 designed to stop it so it would be an idea of  
 16 slowing it down until the military could  
 17 intervene.  
 18 "So that was the -- so that was the idea and set of  
 19 recommendations was put together. It went to JOC. Some  
 20 of them were accepted. Some of them weren't."  
 21 So I wanted to clarify what was put to you. The  
 22 evidence of those three witnesses was variously that  
 23 there was an initial set of recommendations that were  
 24 accepted for one site and not for another in relation to  
 25 external parking. Does that change your evidence in any  
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1 way?  
 2 **A. No, it -- it confirms their view was clearly similar to**  
 3 **mine.**  
 4 **Q.** Finally in relation to the suggestion that you knew the  
 5 layout of the external and internal parking. Sir, there  
 6 were some very useful photographs that were produced to  
 7 the inquest on huddle on 26 August that the interested  
 8 parties saw for the first time. Can I just identify  
 9 those. ASG4, loads of 0s, 82. Those are the initial  
 10 photographs of the entrance. I wonder if that can be  
 11 brought up so that it is clear. That is the one with  
 12 the dented poles. So these were introduced to the  
 13 parties on 26th. I think your main report is the  
 14 28th August. Were they given to you, this photo of the  
 15 entrance before you completed your first report?  
 16 **A. This is the first time I've seen these.**  
 17 **Q.** If you can just roll to the next one, please, in that  
 18 sequence. Thank you. Did you see that one that's in  
 19 the sequence?  
 20 **A. No.**  
 21 **Q.** And then the next one of the bus across the entrance.  
 22 **A. No.**  
 23 **Q.** So you were working on, if you will, written documents  
 24 rather than photos of the layout of the car park when  
 25 you provided your report?  
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1 **A. Yes.**  
 2 MR RITCHIE: Sir, thank you for the time to clarify that.  
 3 I am very grateful.  
 4 MR OWEN-THOMAS: Sir, if I may there is one matter arising  
 5 out of the questions. It is just one question.  
 6 Further questions from MR OWEN-THOMAS  
 7 MR OWEN-THOMAS: You have been asked, Mr Braziel, about the  
 8 CCTV around the site. Can you help Her Majesty's  
 9 Coroner with what role CCTV played in giving the site  
 10 advance warning of a terrorist attack?  
 11 **A. Because I have no detailed knowledge of what CCTV was**  
 12 **actually available there from the evidence I have seen,**  
 13 **I suspect it was merely monitoring the perimeter with**  
 14 **the availability of some of the cameras that were pan**  
 15 **tilt and zoom, they were able to manoeuvre them**  
 16 **externally as well as internally. The CCTV cameras are**  
 17 **as good as the person who is sat watching them assuming**  
 18 **they are in fact monitoring them all the time.**  
 19 Q. Is it right that it might well provide a useful  
 20 deterrent for pilfering or theft or shortcuts across --  
 21 **A. It is more likely to be used for shall we say domestic**  
 22 **incidents rather than terrorist attacks.**  
 23 Q. You mean things like staff control, theft, that sort of  
 24 thing?  
 25 **A. Yes.**

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1 **MR OWEN-THOMAS: I am very grateful. Thank you, Mr Braziel.**  
 2 MR POPAT: Sir, I have no questions. Just in relation to  
 3 the long passages of evidence Mr Ritchie put to the  
 4 witness there are a number of other passages indeed  
 5 following on from those passages which if it is  
 6 important no doubt you will come back to.  
 7 THE CORONER: Yes, thank you very much.  
 8 You have been answering questions all day and you  
 9 have had your attention drawn to various points from all  
 10 the different advocates and I think you have certainly  
 11 seen and heard some things you weren't aware of when you  
 12 wrote your report?  
 13 **A. That's correct, sir.**  
 14 THE CORONER: And in your report you say that the physical  
 15 security protection at the site was flawed. That is how  
 16 you put it in your report. What I want to know is this:  
 17 whether that is still your view or whether it's not  
 18 still your view and whatever the answer to that question  
 19 is what are the reasons for your view now, whatever it  
 20 is.  
 21 **A. I think it's -- the way I have probably put it is it was**  
 22 **the planning for the physical security that was flawed**  
 23 **because of its reliance upon external measures ie the**  
 24 **military and the Gendarmes to provide the first and**  
 25 **second lines of defence. So whilst I may well be**

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1 **referring to physical security there are some elements**  
 2 **that should be enhanced. The gates, for example, making**  
 3 **sure they're closed, improving probably the chicane to**  
 4 **a more solid structure. As I alluded I personally would**  
 5 **have put lighting further out so that you can actually**  
 6 **see anybody approaching at night. So the flawed element**  
 7 **is the idea that it was designed on the pretext that the**  
 8 **military were going to defend you.**  
 9 THE CORONER: And if the right conclusion was that they  
 10 couldn't do that, then what you say is more is required  
 11 at the site itself.  
 12 **A. Then you need to improve the security of the site, it**  
 13 **needs to be stronger. It needs to be solid and the**  
 14 **accommodation and the areas where your people are have**  
 15 **to be able to resist forcible attack.**  
 16 THE CORONER: All right. Thank you very much. Thank you.  
 17 There is one other thing that you haven't seen which  
 18 is a statement by a Mr Porter. I think you have heard  
 19 about it but not actually seen it.  
 20 **A. Yes.**  
 21 THE CORONER: About some measures that have been taken  
 22 since. For obvious reasons you will understand everyone  
 23 knows here about them but we are not broadcasting those  
 24 because that would be foolish in the extreme. But what  
 25 I am going to ask is please it is not a long document

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1 but we will provide you with a copy of that and will you  
 2 just have a look at that. I am going to ask, please,  
 3 could you just provide us with something, it doesn't  
 4 need to be long, it can be as long or as short as you  
 5 want to make, but just as to what your view is about  
 6 those measures, broadly speaking whether you are  
 7 satisfied whether that is required or whether there is  
 8 more. Is that all right?  
 9 **A. I will do so.**  
 10 THE CORONER: I am very grateful. Mr Popat, do you want to  
 11 say anything about that?  
 12 MR POPAT: Only that everyone who has been provided with  
 13 a copy of that statement has been asked if they would to  
 14 sign an undertaking so could I ask that the same is done  
 15 with Mr Braziel.  
 16 THE CORONER: Yes, certainly, that will be done for that  
 17 reason.  
 18 Anything else for Mr Braziel from anybody? No. All  
 19 right, thank you very much indeed for coming.  
 20 (The witness withdrew)  
 21 THE CORONER: Ms Dolan, I think so far as we are concerned  
 22 there are really two principal things left for the  
 23 moment given the decision I have made about deferring  
 24 the two witnesses. One is I think some evidence that  
 25 remains to be read and there may be some other loose

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1 ends and then the question from the disclosure process  
2 which Mr Underwood is coming to help us about tomorrow.  
3 So I think you are satisfied that the reading that can  
4 be done is comfortably to be done within less than  
5 a day.  
6 MS DOLAN: I should think so, sir.  
7 THE CORONER: It may be possible, I don't know but it may be  
8 that it can be cut down in some respects, I don't know  
9 but I will leave that with you and I am very grateful.  
10 What I think I will say is 11 o'clock then to start  
11 tomorrow. So that in an ideal world -- I am working on  
12 something with Mr Underwood, there may be time to give  
13 you that in advance of 11 o'clock, but equally there may  
14 not be. But we'll see how it goes. So 11 o'clock  
15 tomorrow.  
16 (3.50 pm)  
17 (The inquest adjourned until the following day at 11.00 am)  
18  
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