

In the matter of the Commissions of Inquiry Act 1908

And

In the matter of the Canterbury Earthquakes Royal Commission

**Supplementary submissions of Holmes Consulting Group in relation to
Pyne Gould Corporation building hearing**

Date: 22 February 2012



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May it please the Commission

- 1 This submission is supplementary to the submissions of Holmes Consulting Group Limited (**HCG**) dated 21 December 2011.
- 2 It has been suggested to HCG that there is a portion of its submissions which, in the absence of full knowledge of relevant documents and transcript references could be interpreted in a way not intended by HCG. Specifically, that there could be an interpretation suggesting that HCG maintains that it recommended to Pyne Gould Corporation Limited (**PGC**) that strengthening work to the shear core be done and that PGC did not follow that recommendation.
- 3 This relates to paragraphs 4 and 8 of HCG's submissions.
- 4 For clarity, HCG notes that the 1997 seismic evaluation report¹ and associated other documents² including from 2007³ were produced for and supplied to the architects (Warren & Mahoney) and building consultant (Mr Fox) appointed by the owners of the building. HCG was aware at the time that PGC was the owner. However, HCG has no knowledge (beyond the witness evidence and documents which have been provided to the Commission by other parties) of what information and recommendations were provided to PGC and/or its Board. Accordingly HCG's submissions should not be taken as suggesting that HCG's position is that it made recommendations to PGC about the shear wall which PGC chose not to follow.
- 5 HCG expects that these points of clarification will be clear from the transcript and underlying documents. However there is a high degree of public interest in the Commission's inquiry, and the submissions are

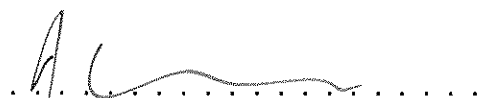
¹ BUI.CAM233.0026.

² Including HCG's Interim Report - Preliminary Analysis dated 25 March 1997 (BUI.CAM233.0035A4.13-14).

³ Including the memorandum from HCG to Warren & Mahoney dated 4 July 2007 (BUI.CAM233.0021).

matters of public record, so HCG offers these clarifications out of an abundance of caution.

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A handwritten signature in black ink, appearing to read 'JG Hannan', written over a horizontal dotted line.

JG Hannan
Counsel for Holmes Consulting Group