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The Rt Hon Lord Gill
Chairman
ICL Public Inquiry
3rd Floor
Lothian Chambers
59-63 George IV Bridge
Edinburgh
EH1 1RN

PMG/ICLSTOCKLINE/T07G0233

16 May 2008

Dear Lord Gill,

SUBMISSION OF CONCISE STATEMENT BY CORE PARTICIPANTS

Reference is made to the Inquiry's Terms of Reference. In terms of paragraph 19.1 of the ICL Inquiry Procedures Document, a concise statement is required from Core Participants by 16 May 2008. It is respectfully submitted that the requirements of paragraphs 19.1.1 to 19.1.4 are covered by the following issues. In the main, these issues are as set out in our letter of 7 March 2008. Further, it is respectfully submitted that the issues set out are relevant to the Inquiry's Terms of Reference and accordingly will assist the Chairman in fulfilling his terms of reference in terms of paragraph 19.1.5 of the Procedures Document.

It should be noted that at the point of preparing this document, the paperwork for the Inquiry had not as yet been made available. It may be that other issues arise once the paperwork has been made available and considered.

1. The cause of the disaster.
2. The reasons why the disaster happened.
3. Whether the health and safety culture within the factory played any role in the disaster.
4. Whether or not the structure of the factory and any alterations made to it over the years was of any significance to the disaster.
5. The role of the regulatory authorities and whether, in particular, any acts or omissions by the regulatory authorities including the Health and Safety Executive prior to the disaster were of any significance to the disaster.
6. Whether the inter-relationship between gas suppliers and factory operators was of any relevance to the disaster.

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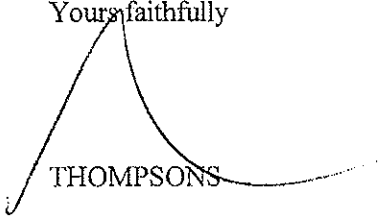
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Southampton South Shields Stoke-on-Trent Swansea

Associated with David Stevenson Solicitor-Advocate

7. The nature of any recommendations that might be made.

If your Lordship requires any further information in connection with the issues raised then we shall be happy to provide it.

Yours faithfully

A handwritten signature in black ink that starts with a long, sweeping underline from the left, crosses under the word 'THOMPSONS', and then curves upwards and to the right, ending under the word 'Yours faithfully'.

THOMPSONS

LMG