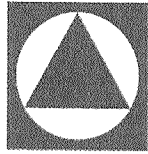


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# INDEPENDENT INQUIRY RELATING TO AFGHANISTAN

MOD Corporate Legal Team

By email only

Date: Tuesday 18 August 2026

Dear MODLT,

**Re: Independent Inquiry Relating to Afghanistan – DAS Update**

I am writing in response to your letter dated 6 August 2026 with the above subject line.

Dealing with your last point first, we agree that it would be helpful to meet, as soon as possible given leave commitments, to help the Inquiry fully understand how the position set out in your letter has come about and for us to agree a way forward to interrogate appropriately and proportionately the very large volume of new material. **To that end, it would be helpful if you could please propose some convenient dates for a meeting.**

Rather than address the matters in your letter in detail in this response, I will just highlight some initial and immediate thoughts and questions that your letter has prompted within the Inquiry, which may also help to confirm the content of AIRU Director Nick Gurr's statement. I will adopt your headings for this purpose.

## 1. DAS File Upload

- (a) Please could you say when were MODLT / AIRU made aware that the substantial upload of documents by DAS (that took place on 26 July 2026) would take place?
- (b) Please could you say what is the MODLT / AIRU understanding of the reason for this upload?
- (c) We note that the upload has resulted in a de-duplicated addition of 159 million documents, of which 97 million relate to the period covered by the Inquiry's Terms of Reference. However, we also note that there has as of yet been no assessment of those documents for relevance to the Terms of Reference. It seems to us obvious that we need to agree quickly on targeted and proportionate search terms to assess the potential volume of relevant material.

## 2. DAS Folders and Additional Images

- (a) We assume, but please can you confirm, that the material referred to under this topic is separate from the material uploaded on 26 July 2026?
- (b) Please could you explain why these folders were not captured by the search terms in the first instance?

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- (c) Please can you confirm details of the volume of material contained within these folders, and by when you expect the review of this material to be complete?
- (d) Please, when providing any updating Rule 9 material, could you identify it as having been derived from this additional cohort of material?
- (e) Please could you set out the detail of the additional targeted searches that AIRU instructed DAS to undertake which has led to the identification of the tranche of additional image files?
- (f) Please could you explain the basis on which 130 of those images have been found to be relevant, i.e. what is the test for relevance that has been applied?
- (g) Please could you indicate by when you expect to provide those images to the Inquiry, both in the event that there is no third-party equity, and in the event that there is what proposal you would make for the Inquiry to be able to have access to the material?
- (h) Please could you provide full detail of the 'improved search methodology' that you intend to apply going forward, for which searches this will be used, and where necessary what are the differences between this and the prior search methodology?
- (i) We assume that you do not intend to convey that the metric by which an 'improved search methodology' should be judged is '[returning] a higher volume of search material'. We would hope that an improved methodology would rather produce a quicker set of material responsive to the search terms and therefore a and more reliable set of *relevant* material. It would be helpful to understand how your amendments to the methodology will help to achieve that.

Please may we hear from you in relation to the above matters (in the event that a meeting cannot be arranged in the meantime) by **25 August 2026**, and with regard to dates for a potential meeting, at your earliest convenience but before that date.

Yours sincerely,

Piers Doggart

**Solicitor to the Inquiry**