

THE MANSTON INQUIRY

MOD SUBMISSIONS FOR PRELIMINARY HEARING ON 15.01.26

1. These submissions are prepared on behalf of the Ministry of Defence (“MOD”) to update the Chair on its progress and in advance of the preliminary hearing to be held on 15 January 2026, 2.30pm, at Dorland House, Paddington.

MOD PROGRESS ON DISCLOSURE REVIEW AND WITNESS STATEMENTS

Disclosure exercise

2. The MOD refers to its ongoing exchange of communications with the Inquiry Legal Team (“ILT”) in respect of its disclosure review.
3. The ILT will be aware that in mid to late December 2025, MOD went live with its Document Management System (“DMS”). This has streamlined the review process considerably and the MOD is now making good progress in its review of Potentially Relevant Material. There has remained some outstanding work on the migration of the material that was manually reviewed prior to the DMS going live, which we continue to work through.
4. The MOD advises that its disclosure review is now in the latter stages and the MOD aims to make a further substantive tranche of disclosure of documents by 30 January 2026. There may be a number of documents which may be disclosed thereafter pending further consultation on those documents with other HMG departments.

Witness statements

5. The MOD has agreed with the ILT that it will provide the three following corporate statements.
 - a. A principal corporate statement, led by Mr Paul Wyatt, Director General (DG) Security Policy.
 - b. A statement focussing on operational matters which directly incorporates the views and contributions of those with front-facing Manston responsibilities. This

will most likely be provided by Lieutenant General Ian Cave, Commander, Standing Joint Command, during the 2022 operation relating to the Defence's role in managing small boat crossings in the English Channel.

- c. A statement focussing on tactical level matters which directly incorporates the views and contributions of those with responsibilities for Manston. This will most likely be provided by Commodore Andrew Ingham, who led the Joint Inter-Agency Task Force, which oversaw and coordinated maritime operations involving all assets responding to channel crossings, as well as military land support at Western Jet Foil and Manston.
6. The MOD is also supporting the former Defence Secretary, Sir Ben Wallace KBC, in preparation of his individual witness statement. It is expected that a draft version of this statement will be sent to the Inquiry by the end of January.

TIMING

7. The MOD remains committed to supporting the Inquiry in fulfilling its terms of reference and is taking necessary steps to assist it in doing so. This includes maximising use of the available resources, prioritising review of key material for the Inquiry and pulling those involved in the corporate witness statements away from their operational or daily duties to assist in responding to the Inquiry's request. This is despite the operational challenges caused for the MOD at times.
8. The MOD notes the Inquiry's intention is that witness statements and the disclosure of evidence will "*commence in February and be largely completed in reasonable time for the hearing*" (CTI Note 6.1.26, §46); and that the Inquiry wishes to plan to commence oral hearings at the beginning of September 2026.
9. As to the timing of witness statements, the Inquiry has stated that it wishes to have witness statements by 30 January 2026. Each time this has been raised in correspondence or orally, the MOD has been clear with the ILT, that while it is endeavouring to have the statement of Sir Ben Wallace ready by that date depending on his availability, it will need until the end of February (at least) to submit draft versions of the corporate statements. That is still the case. The MOD notes the following in particular.
 - a. The MOD's document management system was operational only in mid to late December. It was not possible to progress work on certain disclosure past a certain point without an operational document management system.

- b. Some of the signatories to statements, and contributors to corporate statements, are currently deployed in active service, including overseas. The signatory to the operational corporate statement, General Ian Cave, is currently deployed overseas and faces exceptionally constrained timelines as he transitions his role between 12 to 20 January 2026.
 - c. Sir Ben Wallace has left Government and Parliament. He is heavily committed to his new career outside of Parliament and is travelling overseas in January 2026.
10. As to the timing of the oral hearings, which the Inquiry proposes to commence in September 2026, the MOD does not have any specific submissions to make on this timetable at present. Should the MOD identify any concerns with this timetable following the Inquiry's disclosure, the MOD shall notify the Inquiry promptly. The MOD expects that when it comes to the identification of witnesses to give evidence, and the scheduling of their oral evidence, that this will be formalised only after engagement with MOD.

PROVISIONAL LIST OF ISSUES

11. The MOD has no observations on the provisional list of issues.

OTHER

12. The MOD does not at present consider it necessary to make oral submissions beyond the points made above. That is of course subject to the points raised by others at the hearing on Thursday.

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13.1.26