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The Iraq Inquiry: Some Personal Reflections

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I. Introduction

Prime Minister Gordon Brown's decision to establish the Iraq Inquiry meant that information concerning the role and advice of government lawyers, including the Legal Advisers in the Foreign and Commonwealth Office, entered the public domain long before this might otherwise have happened. The Inquiry benefited from the full participation of those directly involved, who were afforded complete freedom to give evidence on their role. Without the Inquiry the advice of government lawyers on the legality of the 2003 invasion might not have become available until around the year 2033.[1]

Perhaps the most striking fact for lawyers about the Iraq Inquiry Report is that, despite seeking and receiving many views on the legality of the invasion,[2] in the end the Inquiry decided not to express an opinion on what, for lawyers, was a central question. The Inquiry's Chairman,

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[1] It was not until 1988 that a detailed picture of the legal advice concerning Suez (1956) emerged: G Marston, 'Armed Intervention in the 1956 Suez Canal Crisis: The Legal Advice Tendered to the British Government' (1988) 37 ICLQ 773. See also A Hofer, 'The Suez Crisis—1956', in T Ruys, O Corten and A Hofer (eds), *The Use of Force in International Law: A Case-based Approach* (OUP 2018) 36.

[2] In addition to the evidence of those directly involved, the Inquiry received 37 "International Law Submissions" in response to its open invitation to lawyers: <http://webarchive.nationalarchives.gov.uk/20160708115447/http://www.iraqinquiry.org.uk/other-material/submissions-international-law/>. Those making legal submissions included Sir Franklin Berman (former Legal Adviser to the FCO); Maurice Mendelson; Roger O'Keefe; Philippe Sands; Colin Warbrick; and Nigel White. There is much of interest in the submissions, which address a wide range of issues. For example, Ralph Zacklin, who in 2003 was Assistant Secretary-General for Legal Affairs at the United Nations, concluded that '[t]he invasion of Iraq in March 2003 was an illegal act in terms of the Charter of the United Nations and international law. It damaged the UK's standing in the international community, undermined the Charter of the United Nations and severely damaged the credibility of the Security Council as the organ with primary responsibility for the maintenance of international peace and security.' See, for a critique of the reasons given by the Attorney General for his change of position, the submission by Dapo Akande and 22 others (with which Colin Warbrick expressly associated himself).

Sir John Chilcot, explained why it did not do so in his 2 November 2016 evidence to the House of Commons Liaison Committee. When asked whether the invasion was lawful under international law, he avoided giving an answer:

> [i]f you had had a judge-led inquiry, in my view, from all that I have heard and seen, that would not have made it possible for such a judge-led inquiry to reach a view either, because a view is either decisive—determinative—or it is simply an opinion, and we were certainly not in a position to want to offer that opinion. I know others have—in the Netherlands, for example—but it has no effect, so what is the point?[3]

It is perhaps understandable that the Committee did not say outright that they believed the United Kingdom had violated the prohibition on the use of force in article 2(4) of the United Nations Charter. But having decided not to offer an opinion on the law, it might have been better simply to say that expressing such an opinion was not within the Inquiry's mandate or competence, instead of putting forward what seems a rather unconvincing reason: in essence, that since, even if they had been competent, they could not have issued a binding decision, but only an opinion, they should express no view. Be that as it may, Dame Rosalyn Higgins, who was adviser to the Inquiry on international law, suggests in her introduction to the present symposium that 'scholars and practitioners can surely find ample material within the Report on which confidently to base their own conclusions'.[4] This may be so, yet as Christian Henderson puts it, 'while in certain respects the Report is "of devastating clarity", for the most part it requires the art of reading between the lines'.[5]

Given the Committee's decision not to express an opinion, we cannot know what its members really thought, individually or collectively, about the legal arguments of which they heard so much. However, it may indeed be possible to glean something, 'reading between the lines'. For example, the finding that not all diplomatic avenues had been exhausted before force was used in March 2003 has obvious legal implications, even if these were not explicitly acknowledged by the Committee. The same goes for the view that the United Kingdom's action undermined the Security Council's authority; the majority of the members of the Council evidently did not consider that by adopting resolution 1441 (2002) on 8 November 2002 the Council had authorised the use of force that commenced on 20 March 2003.[6]

[3] House of Commons, Liaison Committee, *Follow up to the Chilcot Report*, HC 698, transcript of witness Sir John Chilcot, 2 November 2016, <https://www.parliament.uk/documents/commons-committees/liaison/John-Chilcot-oral-evidence.pdf>, Question 77.

[4] See Higgins in this Symposium.

[5] See Henderson in this Symposium.

[6] See Henderson in this Symposium. My own views were made clear during the Inquiry: see Statement by Sir Michael Wood, 15 January 2010 <http://webarchive.nationalarchives.gov.uk/20171123122659/http://www.iraqinquiry.org.uk/media/95994/2010-01-15-Statement-Wood-1.pdf>;

Two preliminary points should be borne in mind. First, while the Iraq Inquiry Report raises the issues covered in the various contributions to this symposium in stark fashion, such issues are not new for government lawyers advising on matters of public international law and the use of force. Second, what happened in 2002/2003 was hardly typical. There is an obvious risk in seeking to draw general conclusions ('lessons learnt') from exceptional events, tempting though it may be to do so when they were on such a scale, had such far-reaching and long-lasting repercussions, and have been examined in such depth by the Chilcot Inquiry and others.[7]

Second, contrary to a common misapprehension, the British Government did not ignore legal advice in 2003; it acted upon legal advice given at the highest level, albeit advice given late in the day, and after the Attorney General had changed his initial view. Had the Government been advised by the Attorney General that the military action was unlawful under international law, it would not have taken part.[8] One may disagree with the advice and have strong concerns about the way in which it came about; but the fact remains that the invasion of Iraq in 2003 was not a case where a government rejected legal advice and acted regardless.

In the remainder of this contribution, I shall offer one or two comments on Matthew Windsor's piece, which addresses the role of government legal advisers in the field of public international law. Then I shall venture some brief observations on a few of the many issues listed by Dame Rosalyn Higgins in her introduction to this symposium. And, finally, I shall mention a couple of additional points that seem to me to be important.

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Matthew Windsor's contribution joins an increasing literature on the role of government legal advisers in the field of international law.[9] He examines some of the issues raised by the decisions of lawyers to leave or to remain at the FCO. Yet, as he explains, such questions were

Third Statement by Sir Michael Wood, 15 March 2011 <http://webarchive.nationalarchives.gov.uk/20171123123035/http://www.iraqinquiry.org.uk/media/96182/2011-03-15-Statement-Wood-3.pdf>; and Transcript of evidence given by Sir Michael Wood, 26 January 2010, <http://webarchive.nationalarchives.gov.uk/20110805203239/http://www.iraqinquiry.org.uk/media/44205/20100126am-wood-final.pdf>.

[7] See, in particular, the Report of the Dutch Committee of Inquiry on the War in Iraq, 12 January 2010, <https://www.rijksoverheid.nl/documenten/rapporten/2010/01/12/rapport-commissie-davids> ('Davids' Report). Chapter 8 of the Report ('The Basis in International Law for the Military Intervention in Iraq') has been published in English with an Introductory note in (2010) 57 NILR 81–137. See Schrijver in this Symposium.

[8] Transcript of evidence given by the Rt Hon Tony Blair, 29 January 2010, <http://www.iraqinquiry.org.uk/media/229766/2010-01-29-transcript-blair-s1.pdf> 150 ('let me make it absolutely clear, if Peter [the Attorney General] in the end had said, "This cannot be justified lawfully", we would have been unable to take action').

[9] See, eg, A Zidar and J-P Gauci (eds), *The Role of Legal Advisers in International Law* (Brill 2016).

reasonably regarded by the Inquiry as beyond its remit. It might well have been considered inappropriate, indeed impossible for the Inquiry to seek to lay down when a government lawyer should leave or stay 'stoically' at his or her desk,[10] when advice is not followed or when he or she believes that the government is acting unlawfully.

Windsor focuses on two familiar questions. The first is when a public servant (specifically a government lawyer) should resign because of disagreement with the Government. The second is the impact of speaking out publicly about the disagreement, either immediately or later.

As to the first question, Windsor suggests that it was wrong to regard resolution of the 'should I stay, or should I go' conundrum as exclusively within the province of conscience.[11] In his view, the decisions should have been explained instead, or also, in terms of the 'special responsibility' of the international law adviser which they had propounded.[12] Yet 'conscience' is a pretty broad and comprehensive term, which surely includes such matters. During the Inquiry, Baroness Usha Prashar asked '[w]hy do you think she [Elizabeth Wilmshurst] felt the need to consider her position and you didn't? What were your reasons for not considering your position?'[13] I responded:

> [p]eople react differently to different circumstances. I may have briefly considered the matter. Certainly I did when Elizabeth resigned, but my conclusion was that I should carry on...
>
> I think I didn't feel—you know, questions of conscience are very individual questions. I carried on, and I think—I wouldn't say this was the only consideration, but it would have certainly been even more disruptive for the legal advisers in the Foreign Office if there had been a whole host of resignations.[14]

In my view this is not a matter on which one can generalize. Each case is objectively and subjectively different; the facts will differ, as will the circumstances of the particular individual.

As to the second question, Windsor, while noting the impact that speaking out may have, acknowledges the ethical duties of lawyers not to disclose advice given to clients, and the obligations of former officials (including under the Official Secrets Acts) not to speak publicly about sensitive aspects of their work, unless authorised to do so (as they were in 2010/2011 for the specific purpose of giving evidence to the Inquiry). There are obvious legal and ethical limitations on the extent to which it is

[10] The reference is to a remark by Michael Byers, in M Byers, *War Law: Understanding International Law and Armed Conflict* (Grove/Atlantic 2005).

[11] See Windsor in this Symposium.

[12] He refers to 'the Inquiry's limited coverage of the role of government lawyers in foreign ministries who advise on international law. In particular, the Report did not express a view on the government lawyer's so-called "special responsibility", a conception of the advisory function introduced by FCO legal advisers during the Inquiry hearings'.

[13] Transcript of evidence given by Sir Michael Wood (n 6), 63.

[14] Transcript of evidence given by Sir Michael Wood (n 6), 63–64.

proper for lawyers, and for former officials more generally, to say in public what happened when they were working for government.[15]

The suggestion that to remain after a decision has been taken with which one disagrees undermines one's commitment to the law is too general a proposition. In the case of Iraq, the definitive advice to government was that the military action was lawful. There was no question of having to justify a use of force undertaken contrary to legal advice. And, as it turned out, there was no call for FCO lawyers to advocate for the Government's *jus ad bellum* argument after the use of force had commenced. There were, on the other hand, many important legal issues that had to be dealt with by FCO lawyers, both in connection with Iraq (including the rights and obligations of occupying powers, the role of the United Nations), and on all the other matters that are their daily work.

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Dame Rosalyn Higgins, from her vantage point as adviser to the Inquiry on public international law, writes that 'not only are issues relating to the legality of the military action canvassed in some detail, but other matters of interest to international lawyers have also become apparent'. In the introduction to this symposium, she lists 10 issues, both of law and policy, which she suggests may be of interest to international lawyers and others.[16] I shall offer some brief reactions to some of these, drawing for the most part on the written and oral evidence given to the Inquiry. I would recall that my immediate predecessor and successor as FCO Legal Adviser each submitted written statements in response to specific requests from the Inquiry that are particularly relevant to some of the issues raised by Dame Rosalyn: Sir Franklin Berman's statement of 7 March 2011, 'The Processes for Giving and Receiving Legal Advice'[17] (which is separate from his legal submission referred to above);[18] and the 'Statement of Sir Daniel Bethlehem QC' of 24 June 2011.[19]

First, Dame Rosalyn suggests that, although the Report itself made no recommendations regarding the role of the Attorney General in the provision of international law advice, 'there are undoubtedly

[15] Iraq 2003 was not the first time that an FCO legal adviser had resigned over a use of force issue. No lawyer had resigned over Suez in 1956 (though the Minister of State, Anthony Nutting, did resign). In 1986, when US planes attacked Tripoli and Benghazi from airfields in the United Kingdom following the La Belle discotheque attack in Berlin, an FCO Legal Counsellor, Eileen Denza, resigned. Denza did not 'speak out', but the resignation is covered in the then Foreign Secretary's political memoir: Geoffrey Howe, *Conflict of Loyalty* (Methuen 1994).

[16] See Higgins in this Symposium.

[17] Sir Franklin Berman, 'The Process for Giving and Receiving Legal Advice', 7 March 2011 <http://webarchive.nationalarchives.gov.uk/20171123122659/http://www.iraqinquiry.org.uk/the-evidence/witness-statements/>.

[18] See n 2 above.

[19] Statement of Sir Daniel Bethlehem QC, 24 June 2011 <http://webarchive.nationalarchives.gov.uk/20171123122659/http://www.iraqinquiry.org.uk/the-evidence/witness-statements/>.

anomalous elements, flowing inter alia from the fact that the holder of this post will not usually be an international law specialist'.

My views on this have been set out in a submission written jointly with Sir Franklin Berman,[20] and were confirmed in evidence to the Inquiry. When asked whether the existing arrangement worked well in the particular instance, I said:

> [w]ell, I think it could have worked well in this particular instance, and my view on the general question is very firmly that the best way of the government receiving legal advice at the highest level is through a figure like the Attorney and someone who is a minister, someone who is a colleague of the other ministers, and I think particularly in a field like international law, that is the way to ensure that the law is taken seriously and that they get advice—that they follow. I can't think of any other system that would work—that in principle would work as well, leaving aside what happened on this occasion.[21]

For the reasons set out in the submission referred to above, in my view there is merit in having the highest legal advice given by a member of the Government; this need not, and indeed should not, detract from the independence of the advice; and it ensures that it is listened to and respected. The fact that the Attorney General is not necessarily an expert in public international law is not an insurmountable problem. He or she cannot be an expert in every field of law on which advice is needed, and in the case of public international law having an experienced FCO lawyer seconded to the Attorney General's Office works well in practice. The fact that the seconded officer will be junior to the FCO Legal Adviser makes no difference to the effectiveness of the arrangement. The relationship between the FCO lawyers and the Attorney General and his or her Office is of the highest importance in ensuring that the Government takes international law fully into account in all its actions.

Second, Dame Rosalyn suggests that the relationship between legal advice to Ministers from the Legal Adviser of the FCO and the legal advice to the UK ambassador to the UN from the legal adviser to the UN Mission bears further examination and says that the Inquiry was clearly surprised at the absence of structures for coordination between these two sources of legal advice.

The different roles of the FCO Legal Adviser and the Legal Adviser to the UK Mission to the UN, as well as the very special circumstances of

[20] Sir Franklin Berman KCMG QC and Sir Michael Wood KCMG, *Submission in Response to the Consultation on the Role of the Attorney General* (CM 7192), 30 November 2007 (Annex) <http://webarchive.nationalarchives.gov.uk/20171123122659/http://www.iraqinquiry.org.uk/the-evidence/witness-statements/>. See also Transcript of evidence given by Sir Michael Wood (n 6), 8–10. The statements of Sir Franklin Berman and Sir Daniel Bethlehem (n 17 and n 19 above) are of great interest in this regard.

[21] Transcript of evidence given by Sir Michael Wood (n 6), 66–67.

the case, were explained at some length in my third written statement to the Iraq Inquiry.[22] As I there explained:

> the negotiation of SCR 1441 was wholly exceptional, with Washington firmly in the lead and key negotiations taking place directly between foreign ministers, and often over the telephone.[23]

If members of the Inquiry were 'surprised', perhaps that was because they did not fully appreciate the relationship between the FCO and the UK Mission to the United Nations (New York) generally, or how it worked in this particular case. To speak in terms of an 'absence of structures of coordination' seems to overlook the existing flexible links between legal advisers in New York and London, and the very different roles that they perform.

Next, Dame Rosalyn asks whether there are violations of human rights and international humanitarian law which could justify third states insisting on regime change? This is not the place to enter into the larger debate about the legality, under current international law, of intervention to avert an overwhelming humanitarian catastrophe. Questions of humanitarian intervention were raised in relation to attacks or contemplated attacks on Syria in 2013, 2017 (and again in April 2018); the position of successive British Governments is well-known and was stated most recently in relation to the attack on Syria on 14 April 2018.[24] But humanitarian intervention was not part of the British Government's case in 2003.

To insist on 'regime change' is another matter. As the Report states, 'based on consistent legal advice, the UK could not share the US objective of regime change'.[25] It may be that a change of government is the result of armed conflict, or exceptionally is the only way to achieve the lawful objectives of armed conflict, but a change of government cannot itself be a lawful objective.[26]

Dame Rosalyn then asks what the legal implications are, if any, of the Security Council participating to ameliorate a situation which the majority of its members previously thought illegal. This is a good question; the short answer is that there should normally be no legal implications. Any suggestion (and there have indeed been such suggestions) that such participation by the Security Council amounts to endorsement of the legality of the original use of force must be rejected. Such a suggestion

[22] Third Statement by Sir Michael Wood, (n 6), 1, 7–11.

[23] Mr Straw put it as follows: 'I was immersed in the line-by-line negotiations of the resolution, much of which was conducted capital to capital with P5 Foreign Ministers': The Report of the Iraq Inquiry (Report of a Committee of Privy Counsellors), 6 July 2016, vol 5, Section 5, para 407. All sections of the Report are available at <http://www.iraqinquiry.org.uk/the-report/>.

[24] Prime Minister's Office, 'Syria action – UK government legal position', policy paper, 14 April 2018, <https://www.gov.uk/government/publications/syria-action-uk-government-legal-position/syria-action-uk-government-legal-position/>.

[25] Report, Executive Summary, para 25.

[26] Attorney General, 'Iraq: Resolution 1441', Note to the Prime Minister of 7 March 2003.

has no legal basis, since remedial action for the future does not mean endorsement of the past. From a policy point of view, any such suggestion would likely make UN involvement harder to agree upon, just when it is most needed.

Dame Rosalyn then raises the important question of 'the required standard of certainty in the provision of advice by an Attorney General', a point emphasised by Vaughan Lowe in his admirably concise submission.[27] In his submission to the Inquiry, Ralph Zacklin wrote:

> [e]ven assuming that 1441 could be said to have provided grounds for a revival of the authorization in 678, the conclusion that it did so surely required more than a 'reasonable case' argument. Given the gravity of the decision and the cost in terms of human suffering, one would have thought that the government's chief law officer would have relied on a higher standard of analysis and interpretation. Furthermore, in reaching a conclusion which was questionable at best, the Attorney General compounded his error by failing to address adequately the important issue of proportionality in the use of force. A finding that 1441 met the conditions for the revival of 678 could not in the circumstances prevailing at the time namely, a failure by Iraq to meet some of its obligations under the disarmament provisions of 687, a resolution adopted by the Security Council in 1991, justify a use of force that amounted to a full-scale invasion and occupation of Iraq. Force on such a scale was out of all proportion to the alleged material breaches of Iraq's obligations.[28]

In my view, the degree of legal certainty that is required before a government engages in a use of force abroad is first and foremost a political question. As explained in an article published a few years ago,

> [h]ow strong a legal basis is required before a State resorts to armed force is ultimately a policy question rather than one of law. But lawyers can and should advise on the risks of acting on the basis of a 'reasonable', or 'arguable' or 'reasonably arguable' case, for example the risk of domestic and international proceedings, including criminal proceedings. In due course this may involve consideration of the Kampala definition of the crime of aggression: 'an act of aggression which, by its character, gravity and scale, constitutes a manifest violation of the Charter'. In any event, it is important to bear in mind that the definition of the crime of aggression for the purposes of the Rome Statute of the International Criminal Court is not intended to have any effect on the *jus ad bellum*.[29]

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To Dame Rosalyn's list of issues, I would add two more. First, should a government legal adviser give legal advice before it has been requested or

[27] See n 2 above.

[28] Ralph Zacklin (n 2). See also Colin Warbrick's interesting observations in his legal submission (n 2) and Sir Franklin Berman's strong position in his legal submission (n 2).

[29] M Wood, 'The International Law on the Use of Force. What Happens in Practice?' (2013) 53 Indian Journal of International Law 345, 349.

even if such advice has been positively discouraged? As I said at the Inquiry,

> it has always been the culture in the Foreign Office that the lawyers don't wait to be asked. They give advice if they see something that needs some legal input, often in telegrams, whatever, even in the newspapers. They send a minute. The Americans sometimes call that 'aggressive legal advising.[30]

This was a question which presumably faced the British Attorney General in the months leading up to the invasion of Iraq. To me, the answer is obvious. A legal adviser's duty must be to give timely legal advice, whether the client wants it or not. Such advice can of course be of a rolling nature, developing and adjusting with the facts, and if and when new legal and policy elements are brought into play.

But this is not the universal approach. For example, a most interesting collection of articles about the position of the Legal Advisers to the Spanish Foreign Ministry makes it clear that they are only permitted to give legal advice, if and when they are asked for it. They were not asked for legal advice ahead of Spain's assistance to the US–UK led invasion of Iraq; it seems they drafted such advice (to the effect that the invasion would be unlawful), but it was not put forward because they were not asked for it.[31]

Closely related to this is the question of the attitude a legal adviser should take if he or she is told to delay giving legal advice. There may be good reason for delay, for example, if important and relevant factual developments are anticipated. But in principle the legal adviser should be free to give legal advice as and when he or she considers it necessary to do so. It is not acceptable for a client, at least not a government client, to seek to silence the legal adviser, who should be encouraged to speak his or her mind.[32]

My second point is this: is there a difference between giving legal advice to a government on public international law and on domestic law? I believe that there is, for the reasons given briefly to the Inquiry.[33] Elizabeth Wilmshurst took a similar view: 'I think that,

[30] Transcript of evidence given by Sir Michael Wood (n 6), 7–8.

[31] See especially JA Yáñez-Barnuevo, 'A Chronicle of Frustration and Final Vindication: International Legal Advice in Spain and the Iraq War (2002–2003)' (2015) 19 Spanish Yearbook of International Law 297.

[32] Lord Goldsmith himself expressed the position admirably in his minute to the Foreign Secretary in defence of government legal advisers: 'It is important for the Government that its lawyers give advice which they honestly consider to be correct … [T]hey should give the advice they believe in, not the advice which they think others want to hear': Note from Attorney General Lord Goldsmith to Foreign Secretary Jack Straw, 3 February 2003, para 2, available <http://webarchive.nationalarchives.gov.uk/20160512093449/http://www.iraqinquiry.org.uk/transcripts/declassified-documents.aspx>.

[33] See Transcript of evidence given by Sir Michael Wood (n 6), 33–4: 'because there is no court, the legal adviser and those taking decisions based on legal advice, have to be all the more scrupulous in adhering to the law, because it is one thing if—I mean, lawyers have two functions, in-house lawyers: one is to give advice before a decision; the other is to defend the position after the decision.

simply because there are no courts, it ought to make one more cautious about trying to keep within the law, not less'.[34] So too, eventually, did Mr Straw. He wrote to the Inquiry that, in the absence of the ability to secure an authoritative determination of the law from the courts, 'a great weight of responsibility' rested on the shoulders of the Attorney General, and that his role was to determine whether the UK Government could consider the merits of taking military action.[35]

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Dame Rosalyn is undoubtedly right that the Chilcot Report (and associated documentation) contains much that is of great interest for international lawyers. This is also the case, at least within the United Kingdom, for constitutional lawyers as well. The Report, together with the excellent website, now part of the National Archives, is likely to remain of considerable interest for years to come.

As part of giving advice and the client accepting the advice, the absence of a court, I think, is a reason for being more scrupulous in adhering to the advice, because it cannot be tested. It is one thing for a lawyer to say, "Well, there is an argument here. Have a go. A court, a judge, will decide in the end". It is quite different in the international system, where that's usually not the case. You have a duty to the law, a duty to the system. You are setting precedents by the very fact of saying things and doing things. So I would draw the opposite conclusion to that drawn by the Foreign Secretary from the absence of a general court.'

[34] Transcript of evidence given by Ms Elizabeth Wilmshurst, 26 January 2010, <http://webarchive.nationalarchives.gov.uk/20171123123029/http://www.iraqinquiry.org.uk/media/95214/2010-01-26-Transcript-Wilmshurst-S3.pdf> 9.

[35] See Supplementary Memorandum by the Rt Hon Jack Straw MP, February 2010 <http://webarchive.nationalarchives.gov.uk/20171123122659/http://www.iraqinquiry.org.uk/the-evidence/witness-statements/> 5. Mr Straw took the same view in oral evidence before the Inquiry: when asked whether there was a responsibility to be 'all the more scrupulous in adhering to the law' in circumstances where there was no court with jurisdiction to rule on the use of force in Iraq, he replied, 'Yes, of course. You have to be extremely scrupulous because it is a decision which is made internally without external determination': Transcript of evidence given by Rt Hon Jack Straw MP', 8 February 2010, <http://webarchive.nationalarchives.gov.uk/20171123124658/http://www.iraqinquiry.org.uk/the-evidence/transcripts-videos-of-hearings/hearings-2010-02-08/> 26–27.