



Israeli assault on Palestinian civil society: the case of the 6+1 criminalised organisations

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Escola de Cultura de Pau - Associació Hèlia, October 2023*

EXECUTIVE SUMMARY

The case of the 6+1 organisations criminalised by Israel — Addameer, Al-Haq, Bisan Center, DCI-P, UAWC, UPWC and HWC— is part of a more general policy and practice by Israeli authorities to attack and harass Palestinian civil society and critics who question the occupation and the systematic violations of Palestinians' rights. This is a trend that is part of an international scenario of reduced space for action for critical civil society and that, in this particular case, has intensified in recent years. The case of the 6+1 criminalised organisations was preceded by a series of measures, regulations and actions not only against Palestinian organisations, but also against Israeli and international actors involved in investigating the situation of the Palestinian population, in reporting violations and abuses that affect them and in promoting and defending Palestinians' rights. The legal action against the 6+1 criminalised NGOs, and particularly the designation of the six as terrorist organisations, is a qualitative leap in the action taken by Israeli authorities against Palestinian civil society actors. The international reaction to the criminalisation of the 6+1 organisations —especially the displays of solidarity, the recognition of their background and the work they do, and the denouncement of the lack of evidence justifying the action taken against them— raises questions about the long-term impact of the criminalisation and casts doubts on the success of Israel's efforts to question and discredit the NGOs' work. However, as the representatives of the affected organisations acknowledge, criminalisation has had an impact on their work and on their teams and uncertainty remains about how this and other possible new Israeli authorities' actions and policies can affect their activities in key areas for Palestinian society. The experience of the 6+1 organisations is far from being a “closed case” and its development requires careful monitoring, considering the way it affects their activities and other critical Palestinian civil society organisations, the political and economic commitment of external actors and the movement to show solidarity with Palestinians and to defend their rights.

* The report was completed before the events of the 7th October 2023. A brief reference to subsequent developments is included in the Epilogue.

This publication was made by Escola de Cultura de Pau (School for a Culture of Peace) as part of the project “Integral protection, from a gender perspective, for women exposed to multiple forms of violence (West Bank, Palestine)” led by Associació Hèlia and funded by the Agència Catalana de Cooperació al Desenvolupament (ACCD). The content of this publication is the sole responsibility of Escola de Cultura de Pau and Associació Hèlia and does not reflect the opinion of the ACCD. This report is the fifth in a series of publications on gender and Palestine that includes the titles *Occupation, conflict and patriarchy: impacts on Palestinian women* (2019); *Women, peace and security: implementation, challenges and limits in Palestine* (2019), *Challenges of feminist struggles in Palestine in a post-pandemic context* (2022) and *Economic empowerment of women in Palestine: reflections from a feminist perspective* (2023) available at Tasharuk.cat and at the websites of Associació Hèlia and Escola de Cultura de Pau.



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Introduction

On 19th October 2021, Israel designated six prominent Palestinian civil society organisations as “terrorist organisations”. The decision of the Israeli Defence Ministry affected Addameer Prisoner Support and Human Rights Association (**Addameer**); Al-Haq, Law in the Service of Man (**Al-Haq**); the Bisan Center for Research and Development (**Bisan Center**); Defence for Children International-Palestine (**DCI-P**); the Union of Agricultural Work Committees (**UAWC**); and the Union of Palestinian Women’s Committees (**UPWC**). They were all identified as having alleged links to the Popular Front for the Liberation of Palestine (PFLP), a Marxist group classified as a “terrorist” organisation by Israel, the US, the EU and others. The action against this group of organisations had been preceded one year before by the criminalisation of another prominent Palestinian organisation, Health Work Committees (**HWC**), which was also persecuted for its supposed relationship with the PFLP. The action taken against these NGOs prompted widespread condemnation from various actors, who stressed the prominent role they play in documenting and reporting human rights violations by the State of Israel and the fundamental work they carry out in various areas: women, prisoners, defence of minors, agriculture, health and economic rights. The actions taken against these organisations have been denounced as an attempt by the Israel government to silence those critical of the occupation by stripping them of legitimacy and undermining their sources of support and funding. They have been deplored as unjustified actions that violate rights and freedoms, such as the freedom of association and expression and the right to peaceful assembly, privacy and a fair trial.¹

This report explores the experience of the 6+1 Palestinian NGOs criminalised by the Israeli authorities. It is divided into three sections. The first view the criminalisation in context (an environment characterised by the shrinking space of civil society, both worldwide and in relation to Israel/Palestine) and identifies important precedents for the situation faced by these organisations. Along these lines, it connects the experience of the 6+1 NGOs with a phenomenon that is not new, but that has intensified in recent years. In addition, it studies the policies and actors involved in actions against Palestinian civil society organisations and illustrates the range of actions taken against them, including surveillance, direct attacks in the form of raids, harassment, threats and attacks on NGO activists and staff, smear campaigns, legal actions, lawfare, arrests and detentions. The second section addresses the case against the 6 NGOs designated as terrorist organisations, from the actions taken and the stigmatised narrative employed against them (characterised by a lack of evidence) to the impact that criminalisation has had on their ability to pursue their activities and on their respective teams. Finally, the report focuses on the unique nature and lessons that can be learned from the experience of the 6+1 NGOs that are important for the future and transcend the Palestinian context. The Epilogue briefly reflects on some developments occurred after the 7th October, 2023. The report is based on qualitative research, including a review of many specialised reports written by people in academia, human rights organisations and institutions linked to the United Nations. It is also informed by the thoughts and testimonies of representatives of the criminalised organisations and Palestinian experts interviewed online and in person in October 2022 following the recent closure of the offices of the seven NGOs.

1. Human Rights Council, [Report of the Independent International Commission of Inquiry on the Occupied Palestinian Territory](#), including East Jerusalem, and Israel, A/HRC/53/22, 9th May 2023, par. 69-70, p.18; Reuters, [Nine EU states reject Israeli 'terrorist' designation for Palestinian NGOs](#), 12th July 2022; EEAS, [Israel/Palestine: Statement by High Representative Josep Borrell on the Israeli raids on six Palestinian civil society organisations](#), 22nd August 2022.

Shrinking space: context and precedents

The situation faced by Palestinian civil society organisations is usually framed as a global phenomenon characterised by NGOs' shrinking space for action. This concept is mostly used by human rights activists, academics, research centres, NGO networks, journalists and institutions in reference to the growing restrictions imposed on civil society organisations that affect their freedoms and ability to carry out their work. Some argue that discussions around this idea have intensified in the last two decades, and especially in recent years, coinciding with an increase in policies, laws and other informal practices introduced by governments around the world that seek to constrict the space of critical civil society and particularly of actors who receive funding from abroad. In 2016, CIVICUS identified more than 100 countries where freedoms had been curtailed or restrictions had been imposed on civil society.²

As Naomi Hossein and other authors have pointed out actions against these actors include “legal, political and administrative measures, as well as extra-legal strategies such as violence and threats, and domination of public space to delegitimise and stigmatise civil society actors for a range of reasons (...). Violent and ideological attacks on civil society actors have become more common, sometimes with impunity and/or official protection”.³

In a report dedicated to analysing this trend worldwide, Amnesty International indicates that actions used to silence human rights activists and shrink the space for civil society to operate range “from personal attacks, such as threats, beatings and even homicide, to the use of legislation to criminalise activities related to human rights, including surveillance and attacks against activists' ability to communicate and against their rights to peaceful assembly and association, as well as restrictions on their freedom of movement”. It adds that “a fundamental aspect of these methods is the use of smear campaigns and stigmatisation to delegitimise these people and their work”.⁴ These

practices, which have intensified since the early 2000s, —first as part of the so-called Global War on Terror (post 9/11) and then with the expansion of the Internet and global public space—, include the use (or misuse) of counter-terrorism legislation against civil society. Allegations of support for terrorism have grown, resulting in online defamation, defunding by donors and financial de-risking by banks, among other consequences.⁵ Recent studies of this phenomenon have focused on investigating the formal (legal, regulatory, administrative) and informal instruments and strategies used to shrink civic space and repress dissidence, the challenges that this threat poses to civil society actors and donors and the importance of citizen solidarity and other mechanisms to defend the space for civil society to operate.⁶

Various analysts and Palestinian civil society organisations have been warning of an intensification of Israel government' harassment, persecution and attempted silencing of Palestinian organisations critical of the occupation in the last decade

Nothing new, but worse

Given the context of occupation and colonisation, this shrinking of the space for civil society is more complex and multifaceted in Palestine due to the very nature of civic space, with undefined boundaries resulting from a democratic process between political and social forces and because of the network of restrictions imposed by the Israeli authorities, the Palestinian Authority and Hamas (the *de facto* authority in the Gaza Strip)⁷, which civil society actors have criticised⁸ (see Box

1). Recent studies have highlighted that both Israeli and Palestinian authorities seem to increasingly perceive critical human rights organisations as threatening.⁹

With regard to Israeli policies specifically, actions and strategies that seek to shrink Palestinian civil society's space and room for action are nothing new. However, various analysts and Palestinian civil society organisations have been warning of an intensification of Israel government's harassment, persecution and attempted silencing of Palestinian organisations critical of the occupation in the last decade and at a particularly high rate in the last five years—since 2018 or even 2016, according to different

2. CIVICUS, *State of Civil Society Report 2016*, Executive Summary, CIVICUS, p.2.

3. Hossein N. et al., *What Does Closing Civic Space Mean for Development? A Literature Review and Proposed Conceptual Framework*, Institute of Development Studies, IDS Working Paper, Vol.2018, Num.515, July 2018, p.10.

4. Amnesty International, *Defensores y defensoras de los derechos humanos bajo amenaza: la reducción del espacio para la sociedad civil*, Amnesty International, 16th May 2017, p.7.

5. Hossein N., (2018), op. cit. pp.13-15.

6. For more information, see for example the resources and publications on this topic by the Carnegie Endowment for International Peace, the Center for Strategic and International Studies (CSIS), CIVICUS, Open Democracy, the International Center for Non-for-Profit Law (ICNL) and USIP; the reports of the United Nations Special Rapporteurs on the Freedoms and Rights to Association and Peaceful Assembly and on the situation of human rights activists; and the work of authors such as Hossein et al. (2018), and Van der Borgh and Terwindt, *Shrinking Operational Space of NGOs – A Framework of Analysis, Development in Practice*, 22.8, pp.1065-81, 2012.

7. Ubai Aboudi, Wessam Ayaseh and Yehya Abu Ilrob, *Shrinking Space for Women Activists in the West Bank and Gaza Strip*, Bisan Center for Research and Development, 2021, p.6.

8. The limitations imposed by the Palestinian Authority and Hamas do not fall within the scope of this report, but they have been studied by various analysts. For a recent assessment, see for example the Human Rights Council, *Detailed findings on attacks and restrictions on and harassment of civil society actors, by all duty bearers*, Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel, A/HRC/53/CRP.1, 2nd June 2023.

9. ACT Alliance, *Protection of Space for Civil Society and Human Rights Defenders – The Case of Israel and Palestine*, February 2018, p.4.

reports. During this period, the Israeli authorities have implemented restrictive policies and taken action against Palestinian organisations, as well as Israeli and foreign organisations, both locally and abroad, that promote the rights of the Palestinian population and work to provide accountability for violations of rights and crimes committed in the occupied Palestinian territory. Reports indicate that this intensification of Israeli policy in recent years could partly be a reaction to the Boycott, Divestment and Sanctions (BDS) movement, which it perceives as a threat¹⁰ (see **Box 2**). Others say that these practices have

also increased since the International Criminal Court opened an investigation about Palestine (see **Box 3**).

According to a report published by the International Federation for Human Rights (FIDH) in April 2021, before the Palestinian NGOs were listed as terrorist organisations, “Resorting to smear campaigns, intimidation and harassment measures, new restrictive pieces of legislation, administrative burden or judicial harassment and putting increased pressure on international donors who support those organisations have proven to be very

BOX 1: Notes on Palestinian civil society

The Palestinian people have a long history of activism. Some civil society organisations (CSOs) were created in the late 19th and early 20th centuries and pursued social, cultural and political activities that assisted the national movement emerging at that time.¹¹ As various analysts have found, unlike that which occurred in other countries, many of the Palestinian civil society organisations emerged outside the “nation-state” framework and were established before the creation of the Palestinian Authority (PA) in 1994. According to Tariq Dana, it is important to note that “although the structural transformations of Palestinian civil society share similarities with those of other civil societies in the (global) South, what distinguishes it is its transformation in a context of persistent colonisation and Israeli military occupation”.¹² Authors such as Lina Suleiman and Michael Schulz have identified changes in the scope and activities of civil society in the West Bank and Gaza in at least three phases: one prior to the Oslo process (1967-1993), another during it (1994-2000) and the third after it (from 2000 to the present). Their analyses highlight civil society’s role as a social mobiliser and safety net, with many focusing their activity on providing services in the absence of operational government agencies.

Since the Oslo Accords, the civil society scene has observably undergone a process of “NGOisation”, with greater dependence on donors, whilst some organisations

have exerted intense efforts to maintain their activities and remain autonomous from the PA. The work of civil society organisations has been shaped by the authoritarian drift of the PA, which also faces accusations of corruption, as well as by the political rift between Fatah and Hamas and both groups’ control of the West Bank and Gaza, respectively. Both the PA and Hamas have been criticised for actively restricting the work of civil society and repressing dissidents who demand democratisation and changes in the political environment. In legal terms, Palestinian organisations operating in the occupied territory are mainly governed by the Law of Charitable Associations and Community Organizations of 2000. According to the most recent report from the International Center for Not-for-Profit Law (ICNL), there were more than 3,700 organisations registered as associations and organisations (2,800 in the West Bank and 929 in Gaza), based on data from the Ministry of the Interior from 2022.¹³ One of the most prominent Palestinian civil society organisation networks is the Palestinian NGO Network (PNGO), which brings together more than 140 organisations.¹⁴ There are also over 200 international NGOs and 22 United Nations agencies with an extensive history of work in Palestine that play a prominent role in the civil society landscape.¹⁵ One of the main spaces for coordinating international NGOs working in Palestine is the Association of International Development Agencies (AIDA), established in 1967, which brings together more than 80 organisations.¹⁶

10. FIDH, *Target Locked: The Unrelenting Smear Israeli Campaign to Discredit Human Rights Groups in Israel, Palestine and the Syrian Golan*, Observatory for the Protection of Human Rights Defenders, FIDH and OMCT, April 2021, p. 4.

11. Ubai Aboudi, Wessam Ayaseh and Yehya Abu Ilrob, *Shrinking Space for Women Activists in the West Bank and Gaza Strip*, Bisan Center for Research and Development, 2021, p. 15.

12. Tariq Dana, *The Structural Transformation of Palestinian Society*, p. 193, cited in Michael Schulz and Lina Suleiman, *Palestinian NGO’s Changed Work Dynamics: Before, During and Beyond the Oslo Process*, *Middle East Critique*, 29:4, p. 437.

13. International Center for Not-for-Profit Law (ICNL), *Civic Freedom Monitor: Palestine*, 2nd February 2023.

14. For more information, see the website of the Palestinian NGO Network (PNGO): <https://www.pngo.net/en>

15. International Civil Society Centre, *Scoping Study on Operating Conditions of Civil Society in the Occupied Palestinian Territory*, March 2022, p. 6.

16. For more information, see the website of the Association of International Development Agencies (AIDA): <https://aidajerusalem.org/>

BOX 2: Boycott, Divestment and Sanctions (BDS)

Boycott, Divestment and Sanctions, more popularly known by its acronym BDS, is a nonviolent movement promoted by Palestinians that aims to end international support for the State of Israel's oppression of the Palestinian population and pressure it to comply with international law. Inspired by the anti-apartheid movement in South Africa, this initiative was launched in 2005 and currently has activists around the world.¹⁷ Analysis highlights that BDS assumes that other alternatives, mainly negotiations with the Israeli State, have not worked. Therefore, from a rights-based approach, it tries to change the conversation and focus on the State of Israel assuming responsibilities for its policies towards the Palestinian population.¹⁸ The legitimacy of BDS has been recognised by various actors. After a visit to Israel and the Occupied Palestinian Territory, the UN Special Rapporteur for the promotion and protection of freedom of expression stated in 2011, upon the approval of the Israeli Anti-Boycott Law, that “calling for or participating in a boycott is a form of expression that is peaceful, legitimate and internationally accepted”.¹⁹ Human rights organizations such as Amnesty International have expressed similar views, emphasizing that “advocating for boycotts, divestment and sanctions is a form of non-violent advocacy and of free expression that must be protected”.²⁰ The European Union does not support a boycott of Israel, but considers BDS a legitimate movement, protected by freedom of expression and association. Jurists and international human rights organisations have also supported this interpretation of BDS. In 2016, some 200

practicing jurists and lawyers from 15 European countries issued a statement recognising that “States that outlaw BDS are undermining a basic human right (freedom of expression) and threatening the credibility of human rights.”²¹

In recent years, several countries have approved regulations that, in practice, allow criticism of Israel to be designated as anti-Semitic and criminalise forms of protest such as boycotts. In the US, for example, as of mid-2023, a total of 35 states had approved anti-boycott legislation. In Europe, Germany passed a non-binding motion in 2019 equating BDS with anti-Semitism; the United Kingdom made boycotts illegal in July 2023, with a special focus on those who oppose Israel's policies; while in France there have been numerous criminal and administrative proceedings against BDS activists. All this, analysis warns, in a context of growing acceptance in Europe of the International Holocaust Remembrance Alliance (IHRA) definition of anti-Semitism and its equation with anti-Zionism.²² While various processes against BDS activists continue - in Austria, for example, one of them was denounced for using the slogan “Visit apartheid-free Palestine” on social networks -, in 2020 a ruling by the European Court of Human Rights resolved that France had violated the right to freedom of expression by condemning a group of activists who had distributed leaflets in supermarkets calling for a boycott of Israeli products just after the Israeli *Operation Cast Lead* on Gaza (Baldassi case).

BOX 3: The Palestinian case at the International Criminal Court

In 2015, Palestine acceded to the Rome Statute, giving jurisdiction to the International Criminal Court (ICC). The Palestinian government submitted a declaration giving the ICC prosecutor jurisdiction over alleged crimes committed in the occupied Palestinian territory, including East Jerusalem, since 13th June 2014. The ICC prosecutor began a preliminary examination and concluded in 2019 that that the criteria for an investigation had been met and that there were reasonable grounds to believe that war crimes had been committed. However, aware of the complexities

of the case and the controversies surrounding the effective territory of the State of Palestine, the prosecutor referred a query to Pre-Trial Chamber I of the ICC to confirm the territorial scope of the Court's jurisdiction. In February 2021, Pre-Trial Chamber I confirmed that the ICC can exercise its jurisdiction in this case and that the territorial scope includes Gaza and the West Bank, including East Jerusalem.²³ Following this decision, on 3 March 2021, ICC prosecutor Fatou Bensouda announced the opening of an investigation into the situation in the State of Palestine.²⁴

17. For further information, see [What is BDS?](#), BDS movement.net.

18. Nadia Silhi Chahin, “El derecho a defender los derechos: de libertad de expresión y solidaridad con el pueblo palestino”, Epílogo, in Itxaso Domínguez de Olazábal, *Palestina: Ocupación, colonización, segregación*, pp. 165-166.

19. UN OHCHR, *Statement by the UN Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression at the conclusion of his visit to Israel and the occupied Palestinian territory*, 18th December 2011.

20. Amnesty International, *State Department's attack on the BDS movement violates freedom of expression and endangers human rights protection*, 19 November 2020.

21. *Statement by European Legal Scholars Defending the Right to Support BDS for Palestinian Rights*, 8th December 2016.

22. Baoudouin Loos, *The Criminalisation of Solidarity with Palestine Is Gaining Ground in Europe*, *Orient XXI*, 28th July 2023.

23. International Criminal Court, *Situation in the State of Palestine*, ICC 01-18.

24. International Criminal Court, *Statement of ICC Prosecutor, Fatou Bensouda, respecting an investigation of the Situation in Palestine*, 3rd March 2021.

effective [ways for the Israeli authorities] to destabilise NGOs. These trends have reached alarming proportions, and significantly undermine the ability of human rights defenders and NGOs to carry out their legitimate and crucial work".²⁵ More recently, in May 2023, an investigation led by the United Nations Human Rights Council's Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel also stated that the restriction of civic space was the result of an "intentional strategy, pursued by the Government of Israel, of delegitimising and silencing civil society".²⁶ Some analysts identify several dimensions to this strategy, including the criminalisation of Palestinian NGOs and their members (describing them as "terrorists"), the delegitimation of critics (including Israelis) through naming and shaming and by associating them with terrorism and anti-Semitism, pressure on and threats levelled against institutions that give space to civil society discourses, and active lobbying efforts to jeopardise their sources of funding, especially in third countries.²⁷

Israel: actors, norms and policies

Successive Israeli governments have implemented policies to besiege civil society through institutions and other actors close to them, as well as through various regulations. At the institutional level, the Ministry of Strategic Affairs and Public Diplomacy (MSA) stands out. Created in 2006 to coordinate security, intelligence and diplomacy to respond to strategic threats, with a focus on Iran, since 2015 (under the government of Benjamin Netanyahu) the MSA took the leading also seeking to "delegitimise Israel" and boycott campaigns. Since then, it has published various reports targeting civil society organisations and human rights groups, trying to discredit them.

The Israeli authorities' actions are complemented and backed by those of local and international individuals and organisations that increasingly act to "prevent, interfere with and silence" civil society groups and human rights defenders that work for the rights of the Palestinian population, as highlighted by various reports.²⁸ These organisations, many of which receive support and collaborate closely with politicians and members of the government, have been devoting massive resources to developing materials, online content and publications

about certain NGOs and human rights activists, cooperating in drafting bills and with parliamentary lobbies and actively engaging in smear campaigns. One prominent organisation of this kind is NGO Monitor, founded by a close collaborator of Netanyahu in 2002 as a project of the conservative Israeli think tank Jerusalem Center for Public Affairs (JCPA). Funded primarily from private US sources, NGO Monitor describes itself as an organisation working to ensure "that decision makers and civil society operate in accordance with the principles of accountability, transparency and universal human rights ... primarily in the context of the Arab-Israeli conflict". However, their actions have been questioned and criticised, even by Israelis, for focusing on trying to discredit organisations critical of the occupation and demonising support for the BDS movement.²⁹ In 2018, a report by Policy Working Group concluded that NGO Monitor may be considered a "government-affiliated organisation" that "disseminates misleading and tendentious information" whose "overarching objective is to defend and sustain government policies that help uphold Israel's occupation of, and control over, the Palestinian territories".³⁰ Other organisations operating along similar lines include Im Tirzu and the International Legal Forum (ILF), as well as others based abroad, such as UK Lawyers for Israel (United Kingdom) and the Zionist Advocacy Center (United States).³¹

At the same time, in recent years the Israeli authorities have passed legislation restricting civil society activities. This includes the reform of the foundation budget law (2011), the anti-boycott law (2011), the reform of the association law (2016), the counter-terrorism law (2016) and the reform of the law regulating entry into Israel (2017). For example, anti-boycott legislation allows the denial of entry and residence in Israel to people who have publicly taken a position in support of this mechanism of protest against Israeli policies, singling it out. There have also been growing restrictions on freedom of expression and the space for criticising Israeli authorities and their policies and conduct in terms of human rights, which they try to frame or present as the product of "anti-Semitism". This trend has been observed since the International Holocaust Remembrance Alliance (IHRA) adopted a definition of anti-Semitism in 2016 that has proven controversial for its use to dismiss criticism of Israel as illegitimate (see Box 4). Some of the aforementioned organisations,

25. FIDH (2021), op.cit., p.4.

26. Human Rights Council, *Report of the Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel*, A/HRC/53/22, 9 May 2023, par. 6, p. 3. Leaked Israeli Ministry of Intelligence report dated 7th July 2021 and entitled "The Palestinian Battle for Area C - Creating a Security Situation on the Ground, Description and Significance" would confirm this Israel's plan.

27. Ibid and Amal Jamal, *The Rise of "Bad Civil Society" in Israel*. Nationalist Civil Society Organizations and the Politics of .Delegitimization, German Institute for International and Security Affairs (SWP), SWP Comment, January 2018.

28. Human Rights Council, *Report of the Independent International Commission* (2023), op. cit., par. 9, p. 4.

29. FIDH, op.cit., p.21-22.

30. Policy Working Group, *NGO Monitor: Shrinking space: defaming human rights organizations that criticize the Israeli occupation*, September 2018, p.3-4.

31. For more information about these groups, see FIDH, *Target Locked* (2021), op. cit. and Kay Guinane, *The Alarming Rise of Lawfare to Suppress Civil Society: The Case of Palestine and Israel*, Charity Security Network, 28th September 2021.

BOX 4: On anti-Semitism and the definition of the IHRA

Lara Friedman, of the Foundation for Middle East Peace (Washington), writes that “traditionally, ‘anti-Semitism’ means hostility and prejudice toward Jews because they are Jews—a scourge that has imperilled Jews throughout history, and is a source of resurgent threats to Jews today. The IHRA definition, in contrast, is explicitly politicised, refocusing the term to encompass not only hatred of Jews, but also hostility toward and criticism of the modern state of Israel”. She adds that “it labels as ‘anti-Semitic’ ‘applying double standards’ to Israel or requiring ‘behaviour not expected or demanded of any other democratic nation’”. Friedman notes that whilst the IHRA warns that “criticism of Israel similar to that

levelled against any other country cannot be regarded as anti-Semitic’, in practice this ‘double standard’ language has paved the way for attacking virtually all criticism of Israel as *prima facie* anti-Semitic, based on the simplistic argument that focusing criticism on Israel, when other nations are guilty of similarly bad behaviour, can only reflect animus against Jews”. In 2016, the same year that the IHRA published its definition, Israel’s Ministry for Diaspora Affairs released a report stating that it believes that the IHRA definition allows anti-Zionism to be equated with anti-Semitism. In 2019, one of the main authors of the IHRA definition warned of its exploitation by right-wing groups.³²

such as NGO Monitor and the ILF, have tried to spread the idea that the BDS movement and the defence of Palestinian rights are forms of anti-Semitism.

Not only against Palestinian voices

As can be seen from what has been explained thus far, Israel authorities’ actions are not only directed against Palestinian civil society activists and organisations. They also affect foreign actors, including academics and people linked to United Nations agencies and international human rights organisations. Thus, for example, Israel has repeatedly prevented UN special rapporteurs on the human rights situation and members of international commissions of inquiry of the United Nations from entering the occupied Palestinian territory for years, thereby limiting the possibility of investigating human rights violations and hindering their direct communication with civil society organisations and their collection of testimonies. Following the publication of the database on businesses linked to illegal Israeli settlements in the occupied territories by the Office of the UN High Commissioner for Human Rights in 2020, members of the team have suffered retaliation, including Israel’s refusal to grant or renew their visas.³³ Another especially notable case was the expulsion of the director of the Human Rights Watch office for

Israel and Palestine, Omar Shakir, in November 2019, after his work permit was revoked by applying the anti-boycott law. Shakir then warned that the fact that the deportation went ahead without effective international condemnation would give Israel a green light to further restrict the work of Palestinian and Israeli human rights defenders.³⁴

Civil society organisations in Israel committed to defending Palestinians’ human rights have also been subject to increasing policies to shrink their space

Civil society organisations in Israel committed to defending Palestinians’ human rights have also been subject to increasing policies to shrink their space. Certain conservative Israeli civil society groups with political support, sometimes from influential government positions, have led aggressive rhetorical campaigns against these organisations, accusing them of being “unpatriotic” or of “cooperating with the enemy”.³⁵ The most affected have included human rights defenders who have published research and reports on topics such as apartheid practices or business in illegal settlements or who have participated in international forums. Examples of this include the smear campaigns against the former director of B’Tselem, Hagai El-Ad, after his participation in meetings with the UN Security Council; accusations of “anti-Semitism” levelled by Likud politicians against the NGO Breaking the Silence, created by former Israeli soldiers; and statements made by Finance Minister Bezalel Smotrich in November 2022 that Israel had to deal with some of the human

32. For more information on this subject, see Kay Guinane (2021), op. cit., pp. 35-38; International Holocaust Remembrance Alliance (IHRA), *Working definition on antisemitism*, 2016; Lara Friedman, *Weaponizing Antisemitism, State Department Delegitimizes Human Rights Groups*, *The American Prospect*, 12th November 2020; Ben White, *Delegitimizing Solidarity: Israel Smears Palestine Advocacy as Anti-Semitic*, *Journal of Palestine Studies*, Vol. XLIX, no. 2, Winter 2020; Kenneth Stern, *I Drafted the Definition of Antisemitism, Right Wing Jews Are Weaponizing it*, *The Guardian*, 13th December 2019.

33. Al-Haq, *Israel’s Refusal to Grant/Renew Visas to the UN OHCHR Highlights de Urgent Need to End Israel’s Impunity*, 19th October 2020.

34. Omar Shakir, *Raising the Alarm: Israel’s All-Out Assault on Rights Defenders*, Human Rights Watch, 19th August 2022.

35. Amal Jamal (2018), op.cit.

rights groups operating in the country as if they were “an existential threat”.³⁶

Type of actions against Palestinian organizations and the Palestine solidarity movement

In recent years, the Israeli authorities have used various practices directly affecting many Palestinian civil society organisations, including the criminalised 6+1 NGOs, establishing an important precedent and context to assess the subsequent process against them.

As such, there has been an **intensification of surveillance** of the activities and communication of Palestinian human rights activists and defenders. Some studies indicate that surveillance covers different areas, from monitoring funding sources and the membership of NGO board members to direct surveillance on the ground, and argue that some Jerusalem-based³⁷ organisations are especially affected.³⁸ Surveillance also includes activity on social networks, as demonstrated by the fact that hundreds of Palestinians have been arrested for comments made on these types of platforms,³⁹ as well as the use of the controversial electronic spying programme Pegasus, developed by the Israeli company NSO Group. Investigations by Front Line Defenders corroborated by Amnesty International and Citizen Lab (University of Toronto) concluded that Palestinian NGO workers had been targeted by this type of spying on their mobile phones at different times between July 2020 and April 2021. In this case, the analysis of the evidence focused on six activists, three of whom worked in what were later declared “terrorist” organisations: Ghassan Halaika, a researcher at Al-Haq; Ubai Aboudi, the executive director of the Bisan Center for Research and Development; and Salah Hamouri, a lawyer and researcher at Addameer. Three other people affected by espionage preferred not to be identified in the investigation.⁴⁰

Israeli authorities and other associated actors conduct defamation campaigns that undermine the functioning of civil society organisations since they force activists and organisations to constantly explain themselves to defend their reputation

Another common practice consists of **direct attacks in the form of raids on NGO offices, harassment of and threats levelled against their staff and attacks on activists**. Many Palestinian NGOs have been raided by Israeli forces, including the offices of several of the criminalised 6+1 organisations before and after they were listed as illegal and/or terrorist organisations. According to a recent survey study by the International Civil Society Center on the conditions under which civil society organisations operate in the occupied Palestinian territory, 22.6% of them (19 in total, mostly Palestinian organisations and UN agencies) acknowledged having been affected, damaged or harassed in their offices by the Israeli authorities “within the last year”, including through forced entry and confiscation of equipment and documentation (the survey was carried out in the last quarter of 2021).⁴¹ Members of Palestinian human rights organisations have also reported receiving anonymous intimidating messages via telephone and email. Members of Al-Haq’s team have even received death threats that could be related to their activities and their collaboration with the International Criminal Court. Activists have also suffered direct physical attacks by Israeli settlers and soldiers, in a context of lack of protection guarantees and impunity that seems to encourage these practices. One of the most emblematic recent cases is that of human rights defender Issa Amro, based in Hebron, who has been periodically attacked in recent years. A series of judicial charges have also been filed against him for his work, which is internationally recognised for its non-violent activism. Actions on this type have also affected international activists.⁴²

In addition, Israeli authorities and other associated actors such as NGO Monitor, as mentioned above, conduct **defamation campaigns** that undermine the functioning of civil society organisations since they force activists and organisations to constantly explain themselves to defend their reputation in the public sphere and thereby force them to divert time

36. Human Rights Council, Report of the Independent International Commission (2023), op. cit., par. 7, p. 3.

37. The debate over the status of Jerusalem combines legal, political and religious issues and goes beyond the city’s situation since the 1948 war. Following the occupation of East Jerusalem after the 1967 war, Israel has promoted de facto annexation and declared the city its sole and indivisible capital in 1980. However, this declaration has not received majority recognition, with the notable exception of the US under the Trump administration in 2020, and Jerusalem’s annexation is considered illegal under international law. For more information, see, Yotham Ben-Hillel, *The Legal Status of East Jerusalem*, Norwegian Refugee Council, December 2013.

38. International Civil Society Centre, *Scoping Study on Operating Conditions of Civil Society in the Occupied Palestinian Territory*, March 2022, p. 15.

39. Human Rights Council, Report of the Independent International Commission (2023), op. cit., par. 36, p. 9.

40. Amnesty International, *Devices of Palestinian Human Rights Defenders Hacked with NSO Group’s Pegasus Spyware*, 8 November 2021.

41. International Civil Society Centre, *Scoping Study on Operating Conditions of Civil Society in the Occupied Palestinian Territory*, March 2022, p.18.

42. UN OHCHR, *Israel: UN experts condemn attacks against human rights defender Issa Amro and Palestinian civil society*, 17 November 2022. UN News Service, *UN experts urge end to harassment of human rights defenders in Occupied Palestinian Territory*, 18 December 2015; Human Rights Council, *Report of the Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967*, Michael Lynk (A/HRC/34/70), par.39, p.12; Yuval Abraham, ‘Who hits a 64-year-old woman with a bat?’, +972 Magazine, 13 March de 2023; Sam Stein, *Harassment and attacks on human rights activists in Palestine are rarely punished*, The Progressive Magazine, 2 October 2023. According to data from Yesh Din, “Israeli law enforcement agencies are 2.5 times more likely to indict Israelis who harm non-Palestinians in the West Bank (Israeli security personnel and others) than Israelis who harm Palestinians”. For further information, see Yeish Din, Data Sheet, December 2022: Law Enforcement on Israeli Civilians in the West Bank (Settler violence) 2005-2022, 1st February 2023.

and resources that could be better spent on activity specific to their respective areas of work. Many of these campaigns are especially aimed at international actors and the donor community to try to discourage them from funding these organisations or to pressure them to defund them (defunding). An example of this is the report published by the Ministry of Strategic Affairs and Public Diplomacy (MSA) in 2018 aimed at getting the European Union to suspend its funding of Palestinian and international organisations. With a title that makes these intentions explicit, *The Money Trail: The Millions Given by EU Institutions to NGOs with Ties to Terror and Boycotts against Israel*⁴³, the report lists many organisations operating in the OPT, including Al-Haq, the Palestinian Centre for Human Rights (PCHR), Al-Mezan Centre for Human Rights, Applied Research Institute Jerusalem, Al-Kamandjati, the Agricultural Development Association (PARC), the Trocaire Foundation, Norwegian People's Aid, and networks like the Palestinian Non-Governmental Organisation Network (PNGO) and EuroMed Rights. The publication, which includes direct accusations against leaders of some of these NGOs, such as Al-Haq,⁴⁴ was discredited as fallacious by some of the organisations concerned.⁴⁵

In 2019, the MSA published another report entitled *Terrorists in Suits: The Ties Between NGOs Promoting BDS and Terrorist Organisations*, which also seeks to discredit Palestinian human rights organisations for their alleged links with Hamas and the Popular Front for the Liberation of Palestine (PFLP), both listed as terrorist organisations by the United States, the European Union and others. The publication presents BDS as “a complementary track to terrorism” and argues that “terrorists currently hold senior positions in NGOs which promote BDS” and use these positions to “exploit Western governmental funding, philanthropic foundations, financial platforms and civil society to advance their goal of dismantling the State of Israel”.⁴⁶ Defunding and “financial de-risking” are indirect effects of the criminalisation and smear campaigns. Financial institutions may terminate or restrict their relationship with clients to avoid a breach of anti-money laundering or financing of terrorism legislation and regulations they are subject to. This significantly

affects the capacity and ability of Palestinian NGOs to complete projects and carry out their mandates. De-risking can result in, among other things, delay or halt of transactions; closure of bank accounts (often without any reason provided to the customer); refusal to open bank accounts without providing reasons; or overly burdensome customer due diligence requirements.

Alongside the public defamation and stigmatisation campaigns, the **legal actions that affect the organisations and activists** must be considered. These types of actions, together with the online smear campaigns and the reports mentioned earlier, may have severe consequences for the organisations since, as some have warned, donors may be more hesitant or even rule out funding their activities due to the possible fallout.⁴⁷ In this sense, it has been reported that the judicial system, especially the military courts, are used to intimidate and deprive human rights activists and defenders of their freedom. The UN Human Rights Council's Independent International Commission of Inquiry has documented

dozens of cases of people investigated and convicted by Israeli military courts, concluding that “the cases share common elements, including intimidation through interrogation, Israeli Security Forces (ISF) harassment and the use of plea-bargains under duress to obtain convictions without needing to provide sufficiently compelling evidence”.⁴⁸ The commission's report and other analyses state that some of the judicial actions taken by Israeli actors or those that define themselves as pro-Israel can be understood as part of a strategy of what has been called **lawfare**. This practice, which has become popular and extended globally as part of the shrinking of the space for civil society to operate, is usually defined as the instrumental or abusive use of legal actions and judicial processes with the political purpose of harming people or movements. The priority is to cause harm to the adversary, rather than to prevail in a certain legal argument or to prove evidence-based facts. Lawfare tactics have been used against Palestinian organisations, but also against organisations that support Palestinian rights in Europe and the US.⁴⁹

Along these same lines, various analysts have called attention to Israeli authorities' use of **arrest and**

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43. Ministry of Strategic and Public Affairs - Israel, *The Money Trail: The Millions Given by EU Institutions to NGOs with Ties to Terror and Boycotts against Israel*, May 2018.

44. The MSA report argues that the Israeli judicial system considers the director of Al-Haq as operating as a sort of “Dr Jekyll and Mr Hyde” as “sometimes he is the director of a human rights organisation and at other times he is an active part of a terrorist organisation that carries out murder and attempted murder”. Ministry of Strategic and Public Affairs – Israel (2018), op. cit., p. 29.

45. EuroMed Rights, *EuroMed Rights fact check: “The Money Trail” report by Israel's Ministry of Strategic Affairs is inaccurate, false and misleading*, 29th May 2018.

46. Ministry of Strategic and Public Affairs – Israel, *Terrorists in Suits: The Ties Between NGOs Promoting BDS and Terrorist Organisations*, February 2019.

47. International Civil Society Centre (2022), op. cit., p. 17.

48. Human Rights Council, Report of the Independent International Commission (2023), op. cit., par. 22, p. 7.

49. Para más información, véase Kay Guinane, *The Alarming Rise of Lawfare to Suppress Civil Society: The Case of Palestine and Israel*, Charity Security Network, 28th September 2021.

detention to silence critics. The survey-study on the conditions under which civil society organisations operate in the occupied Palestinian territory indicates that 14.3% of the organisations reported that members of their team or volunteers had been arrested or detained by the Israeli authorities (12 organisations in total, of which 10 are Palestinian, one is international and one is Israeli). In 2021 alone, around 150 staff members of various Palestinian organisations were arrested.⁵⁰ In particular, there have been warnings about the use and abuse of “**administrative detentions**” against activists, journalists, human rights defenders and other actors, which are usually supported by evidence declared as “secret” by Israeli authorities and do not lead to charges or trials against the affected people. Notable in this context of legal and judicial action without procedural guarantees is the case filed in 2016 against Mohammad Halabi, the area manager of the organisation World Vision International in Gaza, charged with terrorism and with diverting funds to Hamas. Independent audits commissioned by the organisation and by one of its main donors, the Australian government, found no evidence of misappropriation of funds. Nevertheless, Halabi spent six years in prison and was sentenced to 12 years in prison in 2022 after a trial criticised locally and internationally for its lack of due process. During his detention, Halabi was reportedly put under “enormous pressure” to confess and accept a guilty plea.⁵¹

The HWC precedent

More recently, was the case affecting the organisation Health Work Committees (HWC) and several of its workers. Founded in 1985, this organisation focuses on healthcare for the Palestinian population and especially for the poorest and most marginalised parts of society. It also does important comprehensive healthcare work for Palestinian women, including services to address gender-based violence, and currently runs a hospital and seven healthcare centres in the West Bank. In March 2021, Israeli security forces detained two former HWC employees and an accountant. Weeks later, they arrested its director, Shatha Odeh, and another worker in charge of fundraising, Juana Ruiz Sánchez, also known as Juana Rishmawi (as Rishmawi is the surname

of her Palestinian husband), a Spanish aid worker who has lived in Palestine for decades. They were arrested on charges of belonging to an “illegal” organisation, but prior to the arrests, HWC had not been informed that the Israeli military authorities had decided to ban it on 22nd January 2020.⁵² According to a report released by the Office of the UN High Commissioner for Human Rights, one of the arrested former workers was allegedly mistreated to force a confession and ended up admitting “forgery”, according to his lawyer. The report adds that, by late October, all detained HWC team members were under significant pressure to admit plea deals.⁵³

In this context, the HWC offices were raided several times, during which equipment and materials were confiscated. In June 2021, Israeli forces decreed them closed for six months “for assisting the terrorist organisation Popular Front for the Liberation of Palestine [PFLP]”.⁵⁴ In the months that followed, first Juana Rishmawi (November 2021) and then Shatha Odeh (May 2022) were convicted based on plea bargains, a common practice in military trials.⁵⁵ Rishmawi was sentenced to 13 months in prison and fined for providing services to an “illegal” organisation. She was released from prison in January 2022. Odeh was given a

There have been warnings about the use and abuse of “administrative detentions” against activists, journalists, human rights defenders and other actors, which are usually supported by evidence declared as “secret” by Israeli authorities

five-year suspended sentence for attending a meeting with an “illegal” organisation, alluding to HWC, and for bringing funds into the West Bank without authorisation from the Israeli military authorities. She was released from prison in June 2022. In their testimonies after being released, both acknowledged having been pressured. Rishmawi admitted that the guilty plea was blackmail and the only way to get released. Odeh has stated that she chose to plead guilty because she was convinced that she would be convicted anyway, despite her innocence, and because of her age and health situation. The former HWC director has testified about her mistreatment during her detention, including gruelling interrogations lasting eight and up to eleven hours and limits on her sleep. Both were kept in a men’s prison for several weeks.⁵⁶

The case against HWC was the most direct precedent of the actions against the other six Palestinian civil society organisations that, in a step beyond criminalisation, were listed as “terrorist” organisations

50. International Civil Society Centre (2022), op.cit, p.18.

51. UN OHCHR, [UN experts condemn Israel's arbitrary detention and conviction of Palestinian aid worker](#), 16th June 2022.

52. UN OHCHR, [Implementation of Human Rights Council resolutions S-9/1 and S-12/1](#), Human rights situation in Palestine and other occupied Arab territories, A/HRC/49/83, 18th February 2022, par. 30, p. 8.

53. Ibid.

54. Al-Haq, [Israel's Attack on the Palestinian Health Work Committees is Part of its Systematic Targeting of Palestinian Civil Society](#), 19 June 2021.

55. Plea bargains happen when a defendant admits to being guilty of a criminal offence rather than forcing the prosecutor to prove guilt beyond a reasonable doubt. In exchange for admitting guilt, the prosecutor makes some type of concession to the defendant, such as charging him or her with a less serious crime or recommending less serious punishment.

56. UN OHCHR, [Human rights situation in the Occupied Palestinian Territory, including East Jerusalem, and the obligation to ensure accountability and justice](#), A/HRC/52/75, 13th February 2023, par. 32 and 33, pp. 8-9. See more information at UN OHCHR.

BOX 5: The 6+1 criminalised organisations

Prisoner Support and Human Rights Association
مؤسسة الصعير لرعاية الأسير وحقوق الإنسان

Addameer Prisoner Support and Human Rights Association (Addameer)

<https://www.addameer.org/>

Established in 1991, Addameer provides free legal representation to Palestinian political prisoners held in Israeli and Palestinian jails. The organisation offers legal assistance to the families of incarcerated people, carrying out investigations and reporting and advocacy work.

Designation 375

AL-HAQ
Defending Human Rights

**Al-Haq, Law in the Service of Man (Al-Haq)**

<https://www.alhaq.org/>

Established in 1979, Al-Haq is one of the leading Palestinian human rights organisations. It investigates and documents violations of Palestinians' individual and collective human rights, regardless of the perpetrator. The organisation does advocacy work before local, regional and international organisations and has played an important role in promoting the case against Israel in the International Criminal Court (ICC) and in exposing the situation in Palestine as an apartheid system.

Designation 373



for Research & development

Bisan Center for Research and Development (Bisan Center)

<https://www.bisan.org/>

Created in 1989, Bisan describes itself as a democratic and progressive organisation that seeks to strengthen Palestinian resilience, build an active and democratic community and achieve social justice. It works with a variety of groups (workers, youth, impoverished and marginalised communities and feminist groups) to defend socioeconomic rights in the context of Palestinian national liberation and conducts research, dissemination and advocacy activities.

Designation 374



Defense for Children
International
PALESTINE

Defense for Children International-Palestine (DCI-P)

<https://www.dci-palestine.org/>

A Palestinian affiliate of the Geneva-based organisation established in 1991, DCI-P specialises in defending the rights of minors and provides free legal assistance to people detained and/or prosecuted by the Israeli judicial system. The organisation also investigates, documents, reports on and raises awareness about the situation of detained minors.

Designation 372



UAWC Union of Agricultural Work Committees

Union of Agricultural Work Committees (UAWC)

<https://www.uawc-pal.org/>

Created in 1986, the UAWC was established to respond to the difficulties faced by Palestinian farmers due to restrictions on access to natural resources imposed by the occupation. Its farmer assistance activities include help to rehabilitate land at risk of confiscation.

Designation 371



اتحاد لجان المرأة الفلسطينية
UPWC
Union of Palestinian Women's Committees

Union of Palestinian Women's Committees (UPWC)

<http://upwc.org.ps/>

Established in 1980, the UPWC's work is aimed at empowering Palestinian women at all levels and at contributing to the Palestinian national struggle against the Israeli occupation of Palestine.

Designation 376



مؤسسة لجان العمل الصحي
Health Work Committees

Health Work Committees (HWC)

<http://www.hwc-pal.org>

Founded in 1985, HWC focuses on healthcare, especially for the poorest and most marginalised parts of Palestinian society, including the population of Area C. It also does important comprehensive healthcare work aimed at Palestinian women. HWC manages hospital facilities in addition to several health centres in the West Bank.

by Israel in October 2021. They were all designated as such due to their alleged links with the PFLP, a Marxist-inspired secular political movement with an armed wing that had carried out attacks against Israel in the past. “Israel uses different techniques to criminalise Palestinian resistance. It always finds new techniques that evolve and adapt to reality. Non-violent resistance is more difficult to criminalise. Since 9/11 and the Western policy of ‘war on terrorism’, Israel has exploited this rhetoric and used a narrative by which any Palestinian can be classified as a terrorist, knowing that it will have more resonance”, said Palestinian analyst Inés Abdel Razek, the executive director of the Palestine Institute for Public Diplomacy. The analyst added that “Israel is taking advantage of the fact that Hamas and the PFLP are already criminalised and uses this categorisation, which is political, to denounce an alleged relationship that does not exist and affect NGOs” intentionally at the international level, aware that these organisations depend on foreign funds.⁵⁷ Along these same lines, Yara Hawari said that “Israel has extensively used the term ‘terrorist’ to criminalise and demonise Palestinian activity, whether political or community-related. Therefore, it is not necessarily a new phenomenon. It is part of a long-standing process to destroy and demobilise Palestinian civil society”.⁵⁸

Despite these precedents, the actions against HWC and the fact that the 6 entities became aware of the existence of a secret dossier prepared by Israel to discredit them and argue that they has links to the PFLP, some representatives of the six NGOs declared to be terrorist organisations confess that it was a surprise and that they did not expect this type of legal case to be filed against them.⁵⁹

2. The case against the 6+1 organisations: actions, narrative and impact

On 19th October 2021, the Israeli Ministry of Defence, led at the time by Benny Gantz, designated six Palestinian civil society organisations as “terrorist organisations”, arguing for the application of Israeli Law 5776 on counter-terrorism enacted in 2016.⁶⁰ The Israeli authorities issued six designations, numbers 371 to 376, against Addameer; Al-Haq; the Bisan Center;

Defence for Children International-Palestine (DCI-P); the Union of Agricultural Work Committees (UAWC); and the Union of Palestinian Women’s Committees (UPWC) (see Box 5). The Israeli Ministry of Defence argued that these organisations are part of a network acting on behalf of the PFLP and accused them of supporting its objectives and of promoting and funding the group’s activities. “Those organisations were active under the cover of ‘Civic Society Organisations’, but in practice belong to and constitute an arm of the Organisation’s [PFLP] leadership, the main activity of which is the ‘liberation of Palestine’ and the destruction of Israel. The declared organisations are controlled by the senior leaders of the ‘Popular Front for the Liberation of Palestine’ and employ many ‘Popular Front’ activists in field and management positions, including activists who participated in terror activity”.⁶¹ The Israeli Ministry of Defence also claimed that these NGOs received enormous resources from abroad, especially from European countries and international organisations, “using various means of forgery and deceit”.⁶² This Israeli government decision was not publicly revealed until three days later, on Friday 22nd October, a non-working day in Palestine. Ubai Aboudi, from the Bisan Center, was the first of the organisations’ directors to find out about the designation through a call from a journalist who asked him for statements about it. From then on, the NGO began to communicate and coordinate to analyse the designation as “terrorist organisations” and interpret the meaning and scope of the declaration.

In addition to the designation based on the Israeli counter-terrorism law, two weeks later, on 3rd November 2021, the general in command of the Israeli Central Command in charge of the military occupation in the West Bank declared five of these organisations “unlawful associations” under the 1945 Defense (emergency) Regulations introduced by the authorities of the British Mandate for Palestine. The UAWC and HWC had previously been declared unlawful organisations.⁶³ In practice, under Israeli anti-terrorism law, the banning and designation of these Palestinian civil society groups as “terrorist organisations” allows Israeli authorities to outlaw their activities and authorises them to close their offices, seize their assets, arrest and imprison their staff members and prohibit others from funding them or even publicly expressing support for their activities. Both supporters of and people providing services or

On 19th October 2021 the Israeli Ministry of Defence designated six Palestinian civil society organisations as “terrorist organisations” arguing for the application of Israeli Law on counter-terrorism

57. Interview with Inés Abdel Razek, Jerusalem (online), 23rd November 2022.

58. Interview with Yara Hawari, Ramallah, 6th October 2022.

59. Interview with Sahar Francis, Ramallah, 5th October 2023.

60. Counter-Terrorism Law 5576-2016.

61. National Bureau for Counter the Terror Financing of Israel, *The Minister of Defense designated six organizations of the “Popular Front for the Liberation of Palestine” as terror organizations*, 22nd October 2022.

62. Ibid.

63. Adalah, *Israel's 2016 Counter-Terrorism Law and 1945 Emergency Regulations Regarding the Outlawing of Six Palestinian Human Rights and Civil Society Groups*, Adalah's Expert Opinion. 23rd November 2021, pp. 1-2.

resources to these organisations can be sentenced to up to five years in prison. The criminalised groups categorically denied the accusations against them and were determined to continue their work. “They may be able to close us down. They can seize our funding. They can arrest us. But they cannot stop our firm and unshakeable belief that this occupation must be held accountable for its crimes”, declared Shawan Jabarin, the director of Al-Haq, at the time.⁶⁴ Representatives of the Palestinian organisations insisted that the actions taken against them were illegal, also recalling that it is the Palestinian Authority that is responsible for registering and monitoring Palestinian civil society organisation.⁶⁵

The designation of this group of Palestinian organisations as terrorist organisations prompted an immediate reaction, expressions of solidarity and accusations against the Israeli government for what was interpreted as another attempt to silence criticism of human rights abuses.⁶⁶ Various actors said that the designation put prominent Palestinian organisations with extensive experience and international recognition in check. Leading organisations such as Amnesty International and Human Rights Watch, which collaborate with several of the criminalised Palestinian groups, denounced the Israeli government’s action as an alarming, unjust escalation and part of a systematic effort to punish those who criticise Israeli repressive policies against the Palestinian population and as an assault on the international human rights movement.⁶⁷ Other organisations like the International Federation of Human Rights (FIDH)⁶⁸ and the United Nations Human Rights Office expressed themselves in similar terms. Several Israeli human rights groups, including B’Tselem and the Association for Civil Rights in Israel, also criticised the designation, expressing their willingness to continue collaborating with the criminalised organisations and urging donors to continue to support Palestinian organisations. The “Stand with the 6” campaign was launched locally, regionally and internationally. The displays of solidarity have expressly included HWC as part of the

One of the main critiques of the Israeli government decision has been the vagueness and lack of evidence to support the accusations against the criminalised NGOs

group of 6+1 criminalised organisations, although it was not designated as a terrorist organisation.⁶⁹

One of the main critiques of the Israeli government decision has been the vagueness and lack of evidence to support the accusations against the criminalised NGOs. The designations that indicate these organisations as terrorist specify that they have been considered as such because they are an “inseparable” part of the PFLP and not because of their “said civil activities”.⁷⁰ However, the Israeli authorities have not presented conclusive evidence of this alleged connection with the PFLP. Moreover, such evidence can remain classified under Israeli anti-terrorism legislation.⁷¹ Israel has rejected the criminalised organisations’ request for details about the accusations made against them. The organisations that filed a technical appeal to the Israeli military authority argued that they could not begin an appeal process because they did not have the evidence against them. The Israeli military prosecutor responded formally to the organisations’ demand in January 2022, ensuring that the bulk of the evidence against the criminalised organisations was secret and would remain as such, since disclosing it would put the security of the state at risk.⁷²

A few days after the designation as “terrorist organisations”, in early November 2021, it emerged in public opinion that the Israeli government had a “secret dossier” supposedly detailing the links between the criminalised organisations and the PFLP. The 74-page document prepared by Shin Bet (acronym for the Israeli Security Agency) was allegedly sent to representatives of various European countries in May 2021, when the Israeli government was already accusing these organisations of links with the PFLP and of funding terrorist activities. However, according to media investigations such as those developed by +972 Magazine and Associated Press, the dossier failed to persuade European countries.⁷³ The Shin Bet report was apparently based almost entirely on the statements of the two former HWC employees who

64. Statements made in The Times of Israel in Aaron Boxerman, “Israeli ‘terror’ designation of Palestinian NGOs sparks furious int’l backlash”, *The Times of Israel*, 22nd October 2021.

65. Interview with Ubai Aboudi, Ramallah, 7th October 2022.

66. Harriet Sherwood, “Israel labels Palestinian human rights groups as terrorist organizations”, *The Guardian*, 22nd October 2021.

67. Amnesty International and Human Rights Watch, *Israel/Palestine: Designation of Palestinian Rights Groups as Terrorists. Attack on the Human Rights Movement*, 22nd October 2022.

68. International Federation for Human Rights (FIDH), *Israel/OPT: Six prominent Palestinian human rights groups banned*, 29 October 2021.

69. Human Rights Watch, *Joint Statement: Over 150 Organizations Demand International Community Stand Against Raids and Closures of 7 Palestinian Organizations*, 22nd August 2022.

70. For example, in the case of the UPWC (designation 376), point 4 on the reasons for declaring it a terrorist organisation establishes that “It is clarified that the Union of Palestinian Women’s Committees (UPWC) institution has been declared as a terrorist organisation because it constitutes an inseparable arm of the ‘Popular Front’ terror organisation and not because of its said civil activities” (in English, Hebrew and Arabic in the original document). All designations affecting the rest of the criminalised organisations (371 to 375) include a similar point.

71. International Federation for Human Rights (2021), op. cit.

72. Adalah, *Israel refuses to reveal the evidence against the six Palestinian organizations it has designated as “terrorist organizations”*, 6th January 2022.

73. Yuval Abraham, Oren Ziv and Meron Rapoport, “Secret Israeli dossier provides no proof for declaring Palestinian NGOs ‘terrorists’”, *+972 Magazine*, 4th November 2021.

had already been fired in 2019 for alleged financial misconduct, on suspicion of embezzlement. Both were later detained by Shin Bet. During their interrogations, they accused HWC and the other six organisations of links to the PFLP while suffering from ill-treatment and torture, according to their lawyers, and despite not having worked in those organisations. They also provided no evidence, but instead made vague allegations or speculated about the organisations' possible funding of the PFLP, without making any reference to militant activities.⁷⁴

As the report sent to European diplomats in May failed to convince them of Israeli authorities' arguments, the Israeli government put a new document into circulation in December 2021, this time signed by the Ministry of Foreign Affairs. However, this new attempt for criminalising and discrediting these organisations was also unsuccessful in substantiating the accusations.⁷⁵ Thus, in July 2022, a group of European countries publicly reaffirmed their support for the criminalised organisations and asserted that they had not received substantive evidence to support the accusations of terrorism made against them. In a joint statement, nine countries (Germany, Belgium, Denmark, Spain, France, the Netherlands, Ireland, Italy and Sweden) said that the information received by Israel did not justify a change in their policies towards or relations with these organisations and that they would therefore continue to collaborate with them and support Palestinian civil society.⁷⁶ Shin Bet agents also travelled to Washington in late 2021 to inform US officials of the designation and presented documents similar to those sent to European governments. However, as it later emerged, the Central Intelligence Agency (CIA) also found no evidence to support the Israeli government decision to designate these organisations as terrorist groups.⁷⁷ The United States has chosen not to publicly criticise the action taken by the Israeli authorities, but it has not included the criminalised organisations on its list of terrorist organisations. In mid-2022, however, after the Israeli government closed the offices of these Palestinian organisations, the US government

Faced with creeping criminalisation, the affected Palestinian organisations have remained determined and firm in their commitment to work in their respective fields and none have suspended their activities

expressed its concern and acknowledged that it had not yet received information that would motivate a change in its approach or position towards these organisations.⁷⁸ The UN Human Rights Council's Report of the Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel, published in mid-2023, which specifically examines attacks on, restrictions against and harassment of civil society, maintains that it is "not aware of any credible evidence" to support the actions against the 6+1 criminalised Palestinian organisations.⁷⁹

The actions taken against these Palestinian organisations have also included the closure of their offices, which took place on 18th August 2022 through simultaneous raids by Israeli military forces. The raids on the offices of the organisations in Ramallah were carried out at dawn and included searches for documentation, the destruction and confiscation of equipment and material in the Bisan Center, DCI-P, HWC and the UPWC, and the sealing of office doors, on which military orders were stamped declaring these organisations as illegal and warning that they would remain closed for security reasons.⁸⁰ The closure of the offices of the group of Palestinian NGOs, followed by subpoenas to testify and threats levelled against some of its leaders, once again prompted expressions of concern and solidarity, as well as criticism of the Israeli authorities for the lack of evidence against these organisations and calls not to use anti-terrorist legislation to hinder the work of humanitarian and human rights organisations. "[The Israeli government] seems to be attempting to further reduce the scope for monitoring human rights and for legally opposing Israeli occupation of Palestinian territory, or even to ban them altogether, while abusing anti-terrorist legislation", warned the UN Special Rapporteur on the situation of human rights in the occupied Palestinian territories since 1967, Francesca Albanese.⁸¹

Faced with creeping criminalisation, the affected Palestinian organisations have remained determined and firm in their commitment to work in their respective

74. Joseph Krauss, "Israeli dossier on rights groups contains little evidence", *AP*, 6th November 2021.

75. Oren Ziv and Yuvel Abraham, Israel's new secret document still fails to tie Palestinian NGOs to 'terrorism', *+972 Magazine*, 13th January 2022.

76. Reuters, "Nine EU states reject Israeli 'terrorist' designation for Palestinian NGOs", *Reuters*, 12th July 2022; Joseph Krauss, "Europeans reject Israeli charges against Palestinian NGOs", *AP*, 12th July 2022. For example, see AIDA and UN Palestine, *Statement by UN Agencies and the Association of International Development Agencies working in the Occupied Palestinian Territory*, 18th August 2022; Ministère de l'Europe et de les Affaires Étrangères, *Israeli Raids Of Six Palestinian Civil Society Organisations On 18 August 2022, Statement by the foreign ministries of France, Belgium, Denmark, Germany, Ireland, Italy, the Netherlands, Spain and Sweden*, 19th August 2022; EEAS, *Israel/Palestine: Statement by High Representative Josep Borrell on the Israeli raids on six Palestinian civil society organisations*, 22nd August 2022.

77. Isaac Scher, CIA unable to corroborate Israel's 'terror' label for Palestinian rights groups, *The Guardian*, 22nd August 2022.

78. Ned Price - Department Spokesperson, *Department Press Briefing – August 18, 2022*, US Department of State, 18 August 2022.

79. UN Human Rights Council, *Report of the Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel*, A/HRC/53/22, 9th May 2023 (published on 8 June 2023), p.5.

80. Al Jazeera, 'Not going anywhere': The Palestinian NGOs shut down by Israel, *Al Jazeera*, 19 August 2022; Bethan McKernan, *Israeli forces raid offices of six Palestinian human rights groups*, 18th August 2022.

81. Francesca Albanese, *Situation of human rights in the Palestinian territories occupied since 1967*, A/77/356, 21st September 2022, par. 60, p. 18.

fields and none have suspended their activities. An example is provided by the experience of Al-Haq: “After the designation, the entire team showed up for work before seven in the morning”, recalled its director, Shawan Jabarin, who added: “We are not going to recognise this arbitrary law, because if we accepted it, we would have to go home. They want us at home and not talking about Palestinian rights or filing actions to have Israeli crimes prosecuted. Our reaction was: ‘We’ll take the risk’”.⁸² However, the organisations acknowledge the consequences of the actions taken by the Israeli authorities for their daily work and have taken some precautionary measures. Thus, for example, after the closure of the offices in August 2022, some of the organisations openly defied the ban and reopened their offices. In other cases, the organisations decided to, or had no choice but to, pursue their activities in alternative spaces (the UPWC, DCI-P and HWC). UPWC director Tahreer Jaber explained the reasons: “We all think together about how to work more safely, to protect our women and our team. This is why we are not returning to our offices. We want you to feel safe. We have continued to work in our homes, in cafeterias and in other offices. It is important to mention that [unlike other criminalised organisations], the [Israeli military forces] completely destroyed our offices. They took all the equipment, confiscated files, broke furniture and desks. It is neither appropriate nor safe to work there”.⁸³

The organisations have also introduced additional safeguards and security measures, such as in terms of procedures and communication, as they are aware of the possibility of being spied on by the Israeli authorities. As Addameer director Sahar Francis acknowledged: “We are working in the office trying to avoid unnecessary risks and with more careful procedures, and we are checking surveillance. We feel like we may be affected at every level, in our emails, our phones. We are in contact with human rights networks and international groups to try to work and communicate safely”.⁸⁴

Beyond the resilience and determination to continue their work, criminalised organisations admit to the impacts of Israeli persecution on their workers, considering the detentions, arrests, interrogations, threats and other retaliatory actions that have affected

their teams or that may affect them in the future.⁸⁵

After the offices of the 6+1 NGOs were closed, members of the Al-Haq, DCI-P and UPWC teams were subjected to further interrogations. In general, as they explained, an attempt was made to intimidate them by stressing the possible risks and consequences involved if they continue to work, collaborate with, support or represent the organisations that have been declared illegal and terrorist organisations. They were also told that the

closure of the offices was a final order that would have consequences if ignored.⁸⁶ The case of the UPWC workers is especially notable for the use of coercion with a clear gender dimension, as highlighted in the report of the UN Human Rights Council’s Independent International Commission of Inquiry. Since the designation, over a dozen UPWC members have received threats from Israeli security agents who attempted to coerce them into abandoning their activism. In one case, these warnings came through calls to a UPWC worker’s daughter. Another member of the organisation received threats about possible interference in her daughter’s educational applications.⁸⁷ The Commission of Inquiry, which collected

testimonies from the seven organisations in November 2022, stated that “women human rights defenders reported that the threats and harassment contained prevailing gender stereotypes and were intended to trigger guilt and anxiety, insinuating that they did not fulfil their role as mothers and caregivers”.⁸⁸ UPWC director Tahreer Jaber underlined the difficult situation facing the women of the organisation due to constant perceived threats (some have reported being followed by Israeli forces), the precedents of arrests and detentions (including of UPWC president Khitam Saafin) and pressure from both the Israeli agents and their own environment in many cases (on family, parents and husbands) to quit working or leave the organisation.⁸⁹

Since the NGOs were criminalised, people linked to them have also been affected by the intensification of smear campaigns on social media and travel bans. Sahar Francis of Addameer and Ubai Aboudi of the Bisan Center, for example, were not allowed to travel to the World Social Forum in Mexico in May 2022, where they were scheduled to participate in a seminar on surveillance and the use of the Pegasus programme in

Criminalised organisations admit to the impacts of Israeli persecution on their workers, considering the detentions, arrests, interrogations, threats and other retaliatory actions, including the use of coercion with a gender dimension

82. Interview with Shawan Jabarin, 12th March 2023. (The interview was recorded by Associació de Periodisme Fora de Quadre as part of a documentary on the topic of the criminalisation of the 6+1).

83. Interview with Tahreer Jaber, Ramallah, 6th October 2022.

84. Interview with Sahar Francis, Ramallah, 5th October 2022.

85. Ibid.

86. Interview with Sahar Francis, Ramallah, 5th October 2022.

87. UN Human Rights Council (2023), op. cit., p.6.

88. Human Rights Council, *Detailed findings on attacks and restrictions on and harassment of civil society actors, by all duty bearers*, Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel, A/HRC/53/CRP.1, 2nd June 2023. p. 16.

89. Interview with Tahreer Jaber, Ramallah, 6th October 2022.

attacks against Palestinian civil society.⁹⁰ A travel ban against Aboudi remained in force, without him having received any official notification about the period of the ban or the reasons for it. The last trip he managed to make was to Amman in April 2022, to give testimony before the UN Human Rights Council's Independent International Commission of Inquiry.⁹¹ The teams of these organisations are therefore aware of the wide range of reprisals that the Israeli authorities can take against them at different levels. Beyond the risks of arrest, detention and restriction on movement, Israeli coercive actions can also affect permits or procedures necessary for the civil administration, such as requests for family reunification or even health insurance issues.

The situation of the residents of East Jerusalem requires special mention. Accused of collaborating with a terrorist group and of “breaking loyalty to the Israeli state”, Palestinians who continue to be linked to criminalised organisations risk losing their residence permits in Jerusalem, which has been *de facto* annexed by Israel.⁹² The case of Salah Hammouri, a member of Addameer's team, has been especially illustrative in this regard. Hammouri was stripped of his Jerusalem resident ID and was deported to France in December 2022 after spending several months in administrative detention (see **Box 6**).

The criminalised organisations admit that some people (a minority number) on their teams have ended

BOX 6. The emblematic case of Salah Hammouri

Palestinian human rights activist Salah Hammouri has repeatedly been targeted for punishment by the Israeli authorities for over two decades. He was arrested for the first time when he was 16 years old and has spent different periods in administrative detention. In 2005, he was imprisoned for three years after being charged with alleged involvement in an assassination attempt against the founder of the Israeli Shas party. As he is also a French national, Hammouri rejected the option of deportation to France that was offered to him as an alternative to incarceration and he was sentenced to seven years in prison in 2008. In 2011, Hammouri was released as part of a prisoner exchange that included over one thousand Palestinian prisoners for Israeli soldier Gilad Shalit. In the years that followed, Hammouri was arrested several times and was affected by other actions, such as the non-renewal of the visa and deportation of his wife, a French citizen, whilst she was pregnant in 2016, and the rejection of his request for family reunification.⁹³ Coinciding with the declaration of Palestinian NGOs as “terrorist” organisations, in October 2021 Hammouri was informed of the revocation of his residency permit in East Jerusalem (a legal status only held by Palestinian inhabitants of the city), allegedly for breaching loyalty to the state of Israel, although he was not informed of the evidence supporting the decision.⁹⁴ Later, in the early hours of 7th March 2022, around twenty Israeli soldiers raided his home in East Jerusalem, detained him and

confiscated his mobile phones and computer. Hammouri spent months in administrative detention without charges being brought against him in a case based on “secret information”. It was not until August 2022, after appealing his arrest, that he was informed that he was considered a security threat due to his alleged ties to the PFLP. Finally, on 18th December 2022, Hammouri was deported to France. According to some sources cited by the UN Human Rights Council's Independent International Commission of Inquiry, Hammouri's expulsion could be related to the sentence he received in 2008, in which case it would mean additional punishment for the same acts. Hammouri's appeal against his deportation presents a series of objections to the violation of various laws and denounces the retroactive application of Israel's 2016 Counter-Terrorism Law. International human rights groups have described the case against Hammouri as further evidence of the Israeli authorities' disdain for international law and as a reflection of the framework of rules and policies designed to maintain an apartheid system against the Palestinian population. Amnesty International has argued that Hammouri's deportation and the revocation of his residency permit in East Jerusalem is based on the 2018 amendment of the Entry into Israel Law, which allows the Israeli authorities to revoke the permanent residency status of people charged with “breaching loyalty” to the state of Israel and criticised as a law tailor-made to favour the expulsion of Palestinians.⁹⁵

90. Sahar Francis, a Palestinian with Israeli citizenship, was informed by security agents at the Tel Aviv airport that she could not board the flight that would take her first to the United States and then to Mexico, citing visa problems, even though she had a valid visa until April 2023. Ubai Aboudi, a Palestinian with US citizenship, was blocked by Israeli agents when he tried to cross the border into Jordan without being informed of the reasons for the denial of his departure from Palestine. Both had intended to participate in the World Social Forum in Mexico in a seminar on surveillance and the use of the Pegasus programme in attacks against Palestinian civil society. Akram al-Waara, *Palestinian human rights advocates refused entry to US, blocked from leaving Palestine*, *Middle East Eye*, 5th May 2022.

91. Interview with Ubai Aboudi, Ramallah, 7th October 2022.

92. FIDH (2021), *op.cit.*

93. For more information on this case, see *Addameer*.

94. UN Human Rights Council (2023), *op. cit.*, p. 8.

95. Amnesty International, *Israel/OPT: A perfect storm of apartheid policies led to Salah Hammouri's deportation*, AI, 21st December 2022.

up resigning from their jobs due to being exposed to especially complex situations. They also assert that they try to address the psychological consequences resulting from Israeli authorities' coercive policies in the best way possible. However, many people linked to the organisations recognise that working with this level of pressure is part of their "normality" as human rights defenders and as Palestinians in general. "We have not received psychosocial support, but this is not because we are unaware that it is necessary. We view it as a privilege and an extra step. We try to discuss the stress and support each other (...) Working with prisoners is already stressful in itself and has psychological consequences, as we must deal with cases of torture, ill-treatment, and hunger strikes on a daily basis. (...) It is in these stressful circumstances that attacks on organisations occur. (...) The point is that here in Palestine it is normal. What is not normal is being a calm and relaxed person. This is why those of us who work in human rights do not usually talk about personal issues", said Sahar Francis. Ubai Aboudi of the Bisan Center connected his team's reaction to the Palestinians' resilience: "We had a meeting with the entire team after the [August 2022] raid and explained to them everything that could happen. That they could be prosecuted for coming and working in the office or for continuing with the work. Everyone said they would continue, even two people we had just been hired right before the raid, who had just finished their trial period. This is the resilience of the Palestinian people. In fact, we have had an increase in volunteers willing to help. This is one of the positive things that has happened to us in the midst of all this". The Bisan Center's director recognised the importance of the collective support received at this stage, especially from other Palestinian organisations and local and international coalitions of which the different organisations are part, stressing the role of networks of organisations such as the Palestinian NGO Network (PNGO) and the population in general. "What we are facing is incomparable to what the Palestinians face in their daily lives", he noted.

At a practical and operational level, arrests that affect most of the staff linked to the criminalised organisation are not expected, although the arrest of prominent members of these NGOs cannot be ruled out.

There is some concern about new actions that the Israeli authorities could take to try to further compromise or restrict their daily activities in terms of access to resources and banking operations. As it has been mentioned above, defunding and "financial de-risking"

are indirect effects of criminalisation and smear campaigns, despite the designation does not have extra-territorial validity. The European Legal Support Centre (ELSC) emphasises that banks de-risked Palestinian organisations but also EU organizations working with the six. Banks either halt transactions directed to them or close the (EU) bank accounts of the organisations without reason.

3. Unique nature and lessons learned from the criminalisation of the 6+1 organisations

Various analyses and testimonies of the people involved agree that the case against the Palestinian organisations criminalised by Israel is part of a broader process to undermine Palestinian civil society. However, we can also identify some distinctive elements that make the case of the 6+1 organisations unique, as well as key lessons that can be drawn from this recent experience that are relevant for the future, and not only for the Palestinian context.

Representatives of the criminalised NGOs did acknowledge that there is some concern about new actions that the Israeli authorities could take to try to further compromise their daily activities in terms of access to resources and banking operations

The unique nature of the case is especially due to the form and objective of these Israeli criminalisation policies and by the political background and message they reveal. The first key issue has to do with the regulations used to declare six of these seven organisations as terrorist organisations. Representatives of the affected organisations stress that the Israeli authorities are attempting to apply its own civil legislation in the occupied Palestinian territory, which it is not permitted to do as an occupying power under international law. This practice could set a dangerous precedent, which could make it easier for the Israeli authorities to file charges against Palestinian civil society organisations and could be considered another sign of attempts to achieve *de facto* annexation. "Legally, Israel is not authorised to use its own legal system, its civil law, in the occupied territories. This is annexation. This is the difference now. They [Israel] first designated us by appealing to their counter-terrorism law. Then, when we said that it was illegal, they asked the military governor to issue military orders declaring that we are illegal organisations", said Sahar Francis. Along the same lines, al-Haq has argued that "the designation (...) effectively criminalises Palestinian civil society organisations and their activities under domestic law. By doing so, Israel not only applies its own legislation in the occupied territories in contravention of basic

provisions of international humanitarian law, but it also strives to institutionalise its legislative arsenal aimed at suffocating and suppressing any form of resistance to its oppressive regime”.⁹⁶

Faced with this situation, some of the criminalised NGOs (Addameer, the Bisan Center and UPWC) decided not to appeal their designation as “terrorist” organisations by the Israeli Ministry of Defence. “The idea is that Israel does not have the power to determine what type of civil society we have”. (...) “We decided not to appeal our designation as terrorist organisations for two reasons: firstly, because there is no justice for us, as Palestinians, in the Israeli judicial system; and secondly, because we do not want to give legitimacy to Israeli regulations in occupied territory. Those who did appeal got a similar result, which proves our view”, explained Ubai Aboudi of the Bisan Center. On the contrary, and despite the fact that they had no expectations about the judicial path of their initiative, they did lodge a technical appeal to the decision taken by the Israeli military commander “to demonstrate to the world that there is no justice and that this designation is illegal in all aspects”, said Aboudi. As mentioned in the previous section, in January 2022 the Israeli commander responded to the appeal by claiming that most of the evidence against the organisations was secret.

Another unique feature of the case against the 6+1 organisations has to do with the target of the prosecution. Some of their representatives agree that in the past it was fundamentally individuals who were pursued, but this time the focus has been placed centrally on the organisations. “Historically, members of Palestinian civil society have been attacked, murdered, persecuted and criminalised. The Israeli Army has entered the organisations and has looted them”. (...) “This type of persecution is not unique in the history of Israel. What is unique is that for the first time it needs to persecute the organisations as organisations”, Ubai Aboudi explained. These are not just any organisations, but leading NGOs that work in different areas of Palestinian civil society. Therefore, targeting groups that work on this range of issues also has a symbolic connotation. “When you review the work in which we are involved, it is very clear that what it is about is harming society as a whole. If healthcare, education, children, women and prisoners are affected, what is left? All different aspects of Palestinian daily

civilian life are being attacked. It is not desirable for organisations to be able to support people in their resilience. Therefore, it is totally connected to its political plan of annexation and control of all Palestinian territory. It is not just a matter of the seven NGOs. The impact can be much greater”, Sahar Francis said. Along these same lines, analyst Inés Abdel Razek said that Israel hold suspicious views of the development of a democratic social fabric to which these NGOs contribute: “some of these organisations have activities that are political. They have influence on communities and that is bothersome. It is resistance through resilience”.⁹⁷ With this strategy, the State of Israel intends to wear down organisations by making them divert energy and resources on defending themselves legally and/or publicly against political accusations levelled against them, making it harder to carry out their work as a result. Various people interviewed expressed their frustration at all the time they must dedicate to defending their work, which prevents them from carrying out their work as they have been doing thus far. Furthermore, the intimidating message has repercussions on the rest of the Palestinian civil society organisations beyond the criminalised ones.

Attempts to silence these organisations that document and expose human rights violations in different areas have also been linked and interpreted as a result of Israeli authorities’ interest in avoiding accountability internationally. In this sense, activists and human rights organisations consider the criminalisation policy and the attempts to discredit and isolate these Palestinian organisations as further evidence of Israeli concern over the investigation of the Palestinian case in the International Criminal Court (ICC), formally announced in March 2021.⁹⁸ Organisations like Al-Haq have complained that attacks against them and their legitimacy and the intimidation of members of their team have intensified since they became involved in supporting the ICC’s investigation into Palestine.⁹⁹ Along these lines, the UN Special Rapporteur on the situation of human rights in the occupied Palestinian territories since 1967, Francesca Albanese, warned in her 2022 report that since the designated organisations were actively involved in the case investigated by the ICC, “by attacking the organisations and their work, Israel may be ‘destroying, manipulating or interfering with the collection of evidence’ of war crimes and crimes against humanity, which is strictly prohibited

Attempts to silence these organisations that document and expose human rights violations in different areas have also been linked and interpreted as a result of Israeli authorities’ interest in avoiding accountability internationally

96. Al-Haq (2021), op. cit.p.13.

97. Interview with Inés Abdel Razek, Jerusalem (online), 23rd November 2022.

98. AP, ICC launches war crimes probe into Israeli practices, AP, 3th March 2021.

99. Al-Haq (2021), op.cit., p.8.

100. Francesca Albanese, Situation of human rights in the Palestinian territories occupied since 1967, A/77/356, 21st September 2022, par. 60, pp.18-19.

by international criminal law”.¹⁰⁰ The designation of the NGOs as “terrorists organisations” has also been interpreted within the framework of apartheid. “With this latest arbitrary decision, Israel confirms once again that its apartheid and colonial regime is only sustained through the systematic oppression and repression of those who dare to challenge it”, Al-Haq asserted, specifying that the very definition of apartheid includes acts of persecution of organisations and individuals who are deprived of fundamental rights and freedoms due to their opposition to the apartheid regime.¹⁰¹

Another distinctive feature of the case against the 6+1 organisations is the intention to affect their possibilities to receive funding and particularly the dissuasive message that the Israeli authorities intend to convey to their donors, mostly European countries. Representatives of criminalised groups have warned of the reviews by some governments and their respective cooperation and development agencies. “Israel’s accusations cannot be taken as proven facts”, Ubai Aboudi warned. Months after the designation of the six NGOs as terrorist organisations in October 2021, human rights experts such as the former UN Special Rapporteur on the situation of human rights in Palestine, Michael Lynk, warned of how the delay in several donors’ financial contributions to these NGOs was undermining their work. The European Commission’s funding of some of the criminalised groups was reactivated in mid-2022, when several European countries also reaffirmed their intention to continue collaborating economically with the 6+1 Palestinian organisations. However, the underlying message from the Israeli authorities to European donors involves questioning and casting serious doubts on their projects in Palestine and their monitoring, evaluation and accountability mechanisms. In the words of Sahar Francis: “They are not saying that we are implementing terrorist activities. The [Israeli government’s] main argument for our criminalisation is that we organisations were funnelling money to the PFLP. Oh really? All these countries, all these partners, all the audits over all these years have not been able to discover that we were diverting money. Have we been fooling you all? It’s pathetic. It’s ridiculous.”¹⁰²

Israeli action against the 6+1 NGOs has forced various countries and international organisations that collaborate on development cooperation projects with Palestinian organisations to review their actions and dedicate efforts and resources to identifying the possible repercussions of these policies

In practice, Israeli action against the 6+1 NGOs has forced various countries and international organisations that collaborate on development cooperation projects with Palestinian organisations to review their actions and dedicate efforts and resources to identifying the possible repercussions of these policies. An example of this is the report drafted by the Diakonia International Humanitarian Law Center in Jerusalem on commission from the Jerusalem Technical Cooperation Office of the Spanish Agency for International Development Cooperation (AECID). Written at the behest of Spanish NGOs working in Palestine and collaborating with NGOs declared terrorist and/or illegal organisations by

Israel, the report attempted to explore the legal risks of this cooperative relationship and possible retaliation due to their interaction. The Diakonia report describes how the legal frameworks that Israel has used to criminalise the organisations, such as the 2016 counter-terrorism law and the regulations it enforces in the West Bank, include a huge number of indeterminate or fuzzy provisions that can be applied with sweeping discretion by the Israeli authorities.¹⁰³ In this context, the report weighs the probability of certain risks that Spanish organisations can be exposed to, from criminal investigations of members of their teams for violating the aforementioned regulations to administrative obstacles to obtaining visas and blocked access to resources, including bank accounts. The prospect of criminalisation is also behind the launch of initiatives such as the

European Legal Support Center (ELSC), which monitors incidents that affect people and organisations that advocate for Palestinian rights in Europe, in addition to offering advice and legal assistance.¹⁰⁴

Faced with this context of criminalisation and shrinking space, various Palestinian and international organisations argue that Israel acts in this way due to the context of persistent impunity, which not only encourages policies supporting colonisation and annexation, such as the expansion of settlements, but also escalates action against Palestinian civil society. In this regard, Amnesty International and Human Rights

101. Al-Haq (2021), op.cit, p.12; For further information on apartheid in Palestine, see BTselem, *A regime of Jewish supremacy from the Jordan River to the Mediterranean Sea: This is apartheid*, 12th January 2021; Human Rights Watch, *A Threshold Crossed. Israeli Authorities and the Crimes of Apartheid and Persecution*, 27th April 2021; Amnesty International, *Israel’s Apartheid against Palestinians: Cruel System of Domination and Crime against Humanity*, 1st February 2022; Rania Muhareb et al., *Israeli Apartheid: Tool of Zionist Settler Colonialism*, Al-Haq, 22nd November 2022.

102. Interview with Sahar Francis, Ramallah, 5th October 2022.

103. Diakonia, *Legal Analysis on the Impact for Spanish Organizations of the Designation of Palestinian CSOs as “Terrorist Organizations” or “Unauthorised Associations”*, 25th March 2022, p. 3. Emblematic is also the case of UAWC with the Dutch government. The case started way before the designation, but the final decision to stop funding UAWC came right after the designation, specifically on 5th January 2022.

104. The ELSC was established in Amsterdam in January 2019 and is the result of a joint initiative of the Palestinian Non-Governmental Organizations Network (PNGO), the Dutch NGO The Rights Forum and European jurists. For more information, see <https://elsc.support/>

Watch have stated that “the international community’s decades-long failure to challenge Israel’s serious human rights abuses and impose meaningful consequences for its actions has emboldened the Israeli authorities to act in this brazen way”.¹⁰⁵ “They treat Israel exceptionally and that is why Israel feels it has a green light to continue with its practices. Impunity has become part of the culture, an official policy”, said the director of Al-Haq. He added: “The international community wakes up when there is a great massacre, a great incident (...) there are no consequences or reactions to all the crimes that are committed here, which is why Israel continues. They feel they are above the law. This is also a way to encourage them. It doesn’t matter what government there is in Israel: for the Palestinians, it is the same”.¹⁰⁶

The reaction of the international community to the criminalisation of the 6+1 Palestinian NGOs is therefore considered a key issue. The representatives of the affected organisations argue that the reaction should not be limited to declarations and condemnation and that concrete and forceful actions are required, especially from European countries. Sahar Francis said that “so far their position has been very important, practically and politically, since they have shown their commitment. But I don’t think it’s enough. Statements of support are not enough. What we hope is that European countries will use their power to make Israel stop in its decision against us”.¹⁰⁷ Along these same lines, the Diakonia report also recommends that civil society organisations actively respond to designations to safeguard civic space, stake out a common position and a unified strategy to respond to the restrictions imposed by Israel and refuse to yield to the intimidation campaign.¹⁰⁸

Some have argued that we must all realise that what is at stake extends beyond the Palestinian situation and can have international repercussions. They point to the paralysing effect that the designations can have on human rights work, on the Palestinian defence community and on other actors such as academics, students and journalists, in addition to funders and donors. As Yara Shoufani states, both individuals and organisations may reconsider working and/or collaborating with criminalised organisations for fear of being persecuted for associating with them.¹⁰⁹ In an article in *Just Security* on the impacts of the designations in the US, lawyer Diala Shamas said that “those of us who advise Palestinian rights groups and participate in the defence of Palestinian rights suspect that this is exactly

the desired consequence. In fact, every time there is a new report that purports to uncover terrorist links to Palestinian rights groups, no matter how implausible the accusations, my organisation receives calls from individuals and institutions concerned about their potential liability in light of this new information”.¹¹⁰

Beyond the designations, other analysts have highlighted the impacts of the spread of lawfare against civil society organisations and other actors around the world. “Although lawfare campaigns against civil society are primarily focused on groups operating in Palestine or supporting the human rights of the Palestinian population, the use of these tactics is spreading and may grow if civil society does not respond to it firmly worldwide”, Kay Guinane observed in a report by *Charity and Security Network*, adding that the groups that engage in these practices face few consequences for trying to impose their political agenda and there is little accountability for using disinformation and lawfare.¹¹¹ To try to counter efforts to shrink space, some international actors that support civil society have taken actions ranging from exerting diplomatic pressure to providing emergency funds for activists. Overall, however, as the *Carnegie Endowment for International Peace* noted in 2019, the international response to the problem of shrinking space for civil society seems insufficient. “Closing civic space now appears to be just one part of a much broader pattern of democratic recession and authoritarian resurgence. The international response seems stuck: some useful efforts have been undertaken, but they appear too limited, loosely focused, and reactive.”¹¹²

Final thoughts

The case of the 6+1 organisations recently criminalised by the Israeli authorities is part of a more general policy and practice to attack and harass Palestinian civil society and critics who question the occupation and the systematic violations of Palestinians’ rights. This is a trend that is part of a more global scenario of reduced space for action for critical civil society and that, in this particular case, has intensified in recent years. As explained above, the case of the 6+1 criminalised organisations was preceded by a series of measures, regulations and actions not only against Palestinian organisations, but also against Israeli and international actors involved in investigating the situation of the Palestinian population, in reporting violations and abuse

105. Amnesty International and Human Rights Watch (2022), op. cit.

106. Interview with Shawan Jabarin, 12th March 2023. (The interview was recorded by *Associació de Periodisme Fora de Quadre* as part of a documentary on the topic of the criminalisation of the 6+1).

107. Interview with Sahar Francis, 5th October 2022.

108. Diakonia (2022), op.cit., p.77.

109. Yara Shoufani, “Criminalization of Palestinian Civil Society Will Have International Implications”, *Palestine Studies*, 10th November 2021.

110. Diala Shamas, *The Downstream Effects of Israel’s “Terrorist” Designation on Human Rights Defenders in the US*, *Just Security*, 4th November 2021.

111. Kay Guinane (2021), op.cit., p.vii.

112. Saskia Brechenmacher and Thomas Carothers, *Defending Civic Space: Is the International Community Stuck?*, *Carnegie Endowment for International Peace*, 22nd October 2019.

and in promoting and defending Palestinians' rights. Despite this background, however, the legal action against the 6+1 criminalised NGOs, and particularly their designation as terrorist organisations, is a qualitative leap in the action taken by Israeli authorities against Palestinian civil society actors.

The international reaction to the criminalisation of the 6+1 organisations, especially the displays of solidarity, the recognition of their background and the work they do and confirmation of the lack of evidence justifying the action taken against them, raises questions about the long-term impact of the criminalisation and casts serious doubts on the success

of Israel's efforts to question and discredit the NGOs' work. However, as the representatives of the affected organisations acknowledge, criminalisation has had an impact on their work and on their teams and uncertainty remains about how this and other possible new Israeli government actions and policies can affect their work in key areas for Palestinian society. The experience of the 6+1 organisations is far from being a "closed case" and its development requires careful monitoring, considering the way it affects their activities and other critical Palestinian civil society organisations, the political and economic commitment of external actors, and the movement to show solidarity with Palestinians and to defend their rights.

Epilogue

Further criminalisation of NGOs and shrinking space after 7th October 2023

Since the events of 7th October 2023, actions have intensified that directly and indirectly affect Palestinian civil society organisations, the associations that work with them and the international movement of solidarity with Palestine. In the days following the attack by Hamas, Islamic Jihad and other Palestinian groups, Israeli authorities amended the controversial 2016 anti-terrorism law to criminalise "the systematic and continuous consumption of publications of a terrorist organisation", assuming that this amounts to identification with the group.¹¹³ Meanwhile, arrests of Palestinians multiplied, including more than 3,000 who were in prison under the controversial category of "administrative detention" by the end of 2023, according to data from the Israeli NGO Hamoked.¹¹⁴ The Israeli government also urged the financial sector to step up vigilance against "attempts to fund terrorism". According to the data collected by ELSC, since 7th October Palestinian organisations as well as European organisations transferring money to Palestine or with projects in Palestine received tightened due diligence questions from the banks. Financial institutions are searching on Israel and Palestine in their customer databases and decided to conduct enhanced (more

After 7 October, various European countries decided to suspend and/or review their financial support for Palestinian organisations based on the argument that they had to verify that the funds would not be diverted to terrorist organisations

thorough) due diligence on these parties claiming they have to assess potential risks of funds ending up with Hamas. Likewise, several financial institutions have decided to suspend the transfer of funds to accounts in Gaza and the West Bank. The ELSC adds that other banks closed the bank accounts of Gazans residing in Europe without reason and without prior notice, simply "de-risking" the clients through discriminatory behaviour. The Israeli government's pressure on private and public donors to withdraw their financial support for civil society organisations has also intensified significantly, according to the ELSC.

As reported by the ELSC, after 7th October various European countries decided to suspend and/or review their financial support for Palestinian organisations based on the argument that they had to verify that the funds would not be diverted to terrorist organisations, particularly Hamas. These countries included Austria, Denmark and Finland, which resumed funding in December 2023, as well as Germany, Sweden and Switzerland. In December 2023, the German government announced that its review of its funding had not detected any misuse of funds. However, it was stipulated that German foundations could not finance the six Palestinian organisations declared as terrorists.¹¹⁵ Switzerland suspended financial aid to 11 Palestinian and Israeli organisations and confirmed in November 2023 that it would stop funding three of them.¹¹⁶ The Swedish government ordered a thorough review of

113. Diakonia International Humanitarian Law Centre, *2023-2024 Hostilities and Escalating Violence in the OPT. Account of Events*, 12th January 2024.

114. HaMoked: Center for the Defence of the Individual, <https://hamoked.org/> (accessed 20th February 2024).

115. The ELSC emphasizes that the Federal Ministry of Economic Cooperation and Development (BMZ) used the review as an excuse to end the cooperation with Palestinian civil society and this was shown in a research by F.A.Z. It was also confirmed that Israel was involved in the review of the development cooperation, in fact BMZ emphasises in its report that their priority was also taking Israeli interests into account.

116. The ELSC specifies that with two of them the Swiss government decided to not renew the contracts; meanwhile with the other one an early termination was decided. The FDFA and Swiss media published articles regarding this defunding, stating for example that the organisations were not compliant with the FDFA's code of conduct (for instance through some social networks publications), without providing further information on which behaviours have violated the FDFA's code of conduct and/or contract.

financial aid to Palestine to ensure that the funds were not allocated to any organisation that did not unconditionally condemn Hamas. The report from the Swedish cooperation agency (SIDA) concluded in December that no funds had been diverted to finance terrorist activities, but the government demanded that the investigations be expanded and the communications of all receiving organisations be verified to confirm whether or not they had condemned Hamas. According to various sources, including Amnesty International, demanding that an organisation express such condemnation and making its funding depend on the same violates the right to freedom of expression and association.

In October 2023, the European Commission also announced that it was reviewing its financial assistance to Palestine, though in November it reported that it had found no evidence of funds being diverted for unintended purposes.¹¹⁷ Both the EU and other countries have decided to include additional clauses against incitement to hatred in future calls.¹¹⁸ The ELSC says that some donors are equating failure to condemn Hamas or any reference to Palestinian resistance to incitement to hatred and violence. Amnesty International says that while the clause is not inherently problematic, applying it only to Palestinian NGOs demonstrates a double standard by the EU, stigmatises the Palestinian population and encourages others to incite hatred.¹¹⁹ In January 2024, the European Council established a set of restrictive rules against those who support, facilitate or allow the commission of acts of violence by Hamas or Islamic Jihad. Some expressed doubt and concern about the possible practical repercussions of these rules on the work of European NGOs that work with organisations and develop projects in Palestine.¹²⁰ Meanwhile, since 7th October, restrictions on freedoms of expression and assembly have been reported in some European countries amidst increasing persecution and punishment of protesters who participate in acts of solidarity with Palestine, such as in France, Germany and

UNRWA has also been in the crosshairs since early 2024. The Israeli government claimed that 12 of the organisation's 30,000 workers had participated in the events of 7 October. As a consequence, 15 countries announced the suspension of funding to the UN agency

UK, for example, as well as attempts to link defenders of the rights of the Palestinian population with terrorism and the demonisation of some protests and slogans as anti-Semitic.

Given these developments, around 100 European and international organisations and networks (Amnesty International, EuroMed Rights, OXFAM, Saferworld and others) wrote a joint letter rejecting European governments' decision to suspend and review the funding of Palestinian and Israeli NGOs, compromising the work of civil society in promoting and protecting human rights. Though they recognise that accountability and transparency must be key to international development aid, the organisations question the opportunity, motives and impact of the most recent actions taken. "To our knowledge, the reasons for halting or reviewing funding include unsubstantiated concerns that money could be indirectly diverted to armed groups such as Hamas and unsubstantiated claims that legitimate work by civil society organizations documenting and denouncing human rights violations by the Israeli government amounts to antisemitism and/or incites violence against the State of Israel", the letter states. The organisations said that there had been no demonstrated diversion of funds from the EU or any European state to

Palestinian armed groups to date, despite the accusations that have been levelled for years against some organisations subject to a high degree of scrutiny, adding that "it is a violation of international law for counter-terrorism or "anti-extremism" measures to be used as a pretext to constrain the work of independent civil society".¹²¹

The UN agency for the Palestinian refugee population (United Nations Relief and Works Agency for Palestinian Refugees, UNRWA) has also been in the crosshairs. The Israeli government claimed that 12 of the organisation's 30,000 workers had participated in the events of 7th October. As a consequence, as of 31st January, 16 countries announced the suspension of funding to

117. European Commission, *La Comisión Europea anuncia una revisión urgente de su ayuda financiera a Palestina*, 9th October 2023; and *La Comisión concluye la revisión de la ayuda de la UE a Palestina*, 21st November 2023.

118. The ELSC specifies that the EU Commission - DG NEAR published on 25th November 2023 a communication on the necessity to identify additional measures to be applied to grants to Palestinian civil society organisations, with a focus on the application of the anti-incitement/incitement to hatred clause and introduction of an external monitoring mechanism to check on social media posts of the NGOs and on restrictive measures/diversion of funds. The "anti-incitement clause" was already present in some contracts, and the EU and other Member States want to add it in every future grant contract and invoke it. According to the clause, CSOs cannot engage in actions or expressions that could amount to incitement to violence or hatred directed against persons or groups of persons by reference to race, colour, religion, descent or national or ethnic origin, including through publications or social media, nor condone or trivialise the commission of international crimes. The EU would grant the respect of such clause through a "third party monitor mechanism", i.e. an external agency would be appointed to check the Palestinian CSOs public communications and activities. This would have the chilling effect of restricting CSOs' right to freedom of expression.

119. Amnesty International, *Las restricciones discriminatorias de financiación de los gobiernos donantes europeos a la sociedad civil palestina pueden agravar la crisis de derechos humanos*, 28th November 2023.

120. EUR-Lex, *Council Decision (CFSP) 2024/385 of 19 January 2024 establishing restrictive measures against those who support, facilitate or enable violent actions by Hamas and the Palestinian Islamic Jihad*, 19th January 2024.

121. *Joint letter on the decisions of several European governments to suspend or review its funding to Palestinian and Israeli civil society organisations*, 27th November 2023.

UNRWA: Germany, Australia, Austria, Canada, USA, Estonia, Finland, Iceland, the Netherlands, Italy, Japan, Latvia, Lithuania, Romania, UK and Sweden. The UN fired the workers in question from the agency and announced an investigation. However, in February 2024, the highest authority of UNRWA, Philippe Lazzarini, said that the UN had not received any written report from Israel with evidence of its accusations, despite requests for the Israeli government to collaborate in the investigations.¹²² The Israeli file on UNRWA would have been shared with some states and some media outlets who claim that it does not contain evidence of the accusations.¹²³ Moreover, the US intelligence assessment of Israel's claims, that UN aid agency staff members participated in the Hamas attack on 7th October, said some of the accusations were credible, although could not be independently verified, while also casting doubt on claims of wider links to militant groups.¹²⁴

The Israeli accusations against UNRWA were well-known, but Israel's complaint against its workers was made public on the same day that the International Court of Justice

(ICJ) found it plausible that Israeli acts could amount to genocide. Analysts said that regardless of whether the accusation was true, the decision seemed to be an attempt to distract attention from the court's ruling and warned that the Israeli government has been building a case against UNRWA for some time. In December, a plan by the Netanyahu government to get rid of UNRWA in Gaza had been leaked to the media, whose first phase would seek to highlight alleged cooperation between the agency and Hamas.¹²⁵ Given how events have developed, human rights experts and NGOs criticised the decision by several states to suspend funding to UNRWA, arguing that the alleged actions of a few individuals could not serve as a pretext to cut off vital assistance for millions of people facing an extremely critical humanitarian situation. They also highlighted the double standard and the disparate reaction to the extensive evidence of Israeli war crimes in Gaza and the ruling of the ICJ, which have not led to the end of military or political support for the Israeli state.¹²⁶

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122. Interview with Pierre Lazzarini in the podcast PRIO Peace in a Pod, 20th February 2024.

123. Channel 4, *Israel's evidence of UNRWA Hamas allegations examined*, 5th February 2024; Sky News, *Israel-Hamas war: How strong is Israel's evidence against UNRWA?*, 11th February 2024; Haaretz, *'Unproven Allegations': U.K.'s Channel 4 Slams Israel's Charge Against UNRWA*, 7th February 2024; The New Arab, *Channel 4 says 'no evidence' for Israel's UNRWA claims in six-page dossier*, 6th February 2024.

124. The Guardian, *US intelligence casts doubt on Israeli claims of UNRWA-Hamas links, report says*, 22nd February 2022.

125. Olga Rodríguez, *Israel y EEUU arrastran a otros países en su pulso contra la protección del derecho internacional en Gaza*, 29th January 2024.

126. Ibid and Amnesty International, *Israel/OPT: States must reverse cruel decision to withdraw UNRWA funding*, 29th January 2024.