

INTERNATIONAL COURT OF JUSTICE

**REQUEST FOR AN ADVISORY OPINION BY THE UNITED NATIONS GENERAL
ASSEMBLY IN RESOLUTION 79/232 OF 19 DECEMBER 2024**

**OBLIGATIONS OF ISRAEL IN RELATION TO THE PRESENCE AND
ACTIVITIES OF THE UNITED NATIONS, OTHER INTERNATIONAL
ORGANIZATIONS AND THIRD STATES IN AND IN RELATION TO THE
OCCUPIED PALESTINIAN TERRITORY**

**WRITTEN RESPONSE ON THE QUESTIONS POSED BY JUDGE SEBUTINDE AT
THE END OF THE ORAL HEARINGS ON 2 MAY 2025**



7 May 2025

WRITTEN RESPONSE OF THE STATE OF PALESTINE

1.1. This Written Response is filed by the State of Palestine in answer to the questions posed by Judge Sebutinde at the end of the oral hearings that were held between 28 April and 2 May 2025 and in the context of the United Nations General Assembly's request for an Advisory Opinion regarding the *Obligations of Israel in relation to the presence and activities of the United Nations, other international organizations and third States in and in relation to the Occupied Palestinian Territory*.

1.2. Judge Sebutinde addressed the following questions to the participating States and international organizations:

“Which Third States and other international organizations operate to provide basic services and humanitarian and development assistance in the OPT? To what extent have restrictions, if any, been placed upon their operations in the OPT by Israel since 2 March 2025?”

1.3. The State of Palestine's Written Response is in two parts. The first part identifies the United Nations organs, other international organizations and Third States that operate, or operated until recently, to provide basic services and humanitarian and development assistance in the Occupied Palestinian Territory. The second part addresses the restrictions Israel has imposed on their operations.

Part One

1.4. There are 24 United Nations organs that provide humanitarian aid and developmental assistance in some form to the Palestinian civilian population in the OPT.¹ In addition, there

¹ Food and Agriculture Organization; International Fund for Agricultural Development; International Labor Organization; International Trade Center; UN Department of Safety and Security; UN Development Program; UN Educational, Scientific and Cultural Organization; UN Environmental Programme; UN-Habitat; UN Industrial Development Organization; UN International Children's Fund; UN Mine Action Service; UN Office for the Coordination of Humanitarian Affairs; UN Office of the High Commissioner of Human Rights; UN Office on Drugs and Crime; UN Populations Fund; UN Project Services; United Nations Register of Damage Caused by the Construction of the Wall in the Occupied Palestinian Territory; United Nations Special Coordinator for the

are more than three dozen international NGO's that support the Palestinian civilian population,² third States that contribute humanitarian aid or development assistance,³ and international organizations, including the Organization of Islamic Cooperation and the European Union that provide assistance. All have been duly authorized by the State of Palestine to operate in the OPT.

1.5 Since long before 2 March 2025, Israel has been restricting all these organs, entities and States in respect of their operations in the OPT in the following ways (as evidenced in the State of Palestine's Written Statement and oral pleadings, as well as the submissions of other States and international organizations that participated in the present advisory proceedings):

1. By imposing a blockade on the delivery of humanitarian aid and development assistance – including the supply of essential goods and services urgently needed for the survival and sustenance of the Palestinian civilian population – since at least 9 October 2023.⁴

Middle East Peace Process; UN Trade and Development; UN Women; World Food Programme; World Health Organization; and UN Relief and Works Agency for Palestine Refugees in the Near East.

² Including: Acted; Action Against Hunger, ACF; Action Aid Australia – Palestine; AlianzaPor La Solidaridad; ANERA; CARE International; Caritas Jerusalem; Catholic Relief Services; CESVI; Cooperazione Internazionale Sud Sud; Dan Church Aid/Norwegian Church Aid; Danish Refugee Council; Diakonie Katastrophenhilfe; Global Communities; Humanity and Inclusion; International Medical Corps; International Rescue Committee; Lutheran World Federation; Médecins sans Frontières; Medical Aid for Palestinians; Mercy Corps; Middle East Children's Alliance; Norwegian Aid Committee; Norwegian Peoples' Aid; Norwegian Refugee Council; Oxfam; Première Urgence Internationale; Project HOPE; Relief International; Save the Children; Solidarités International; Swiss Church Aid; Terre des Hommes; The Centre for Mind-Body Medicine; War Child; War Child Holland; We World-GVC.

³ Including: DCAF-Geneva Centre for Security Sector Governance; ENABEL-Belgian Agency for International Cooperation; ERASMUS-EU Programme for Education, training, youth and sport; EU Police and Rule of Law Mission for the occupied Palestinian territory; Deutsche Gesellschaft für Internationale Zusammenarbeit; Japanese International Cooperation Agency; Korean International Cooperation Agency; Turkish Cooperation and Coordination Agency.

⁴ See UN Security Council, Resolution 2712, UN Doc S/RES/2712(2023) (15 November 2023) [https://docs.un.org/en/S/RES/2712\(2023\)](https://docs.un.org/en/S/RES/2712(2023)); UN Security Council, Resolution 2720, UN Doc S/RES/2720(2023) (22 December 2023), [https://docs.un.org/en/S/RES/2720\(2023\)](https://docs.un.org/en/S/RES/2720(2023)); UN Security Council, Resolution 2728, S/RES/2728(2024) (25 March 2024), [https://docs.un.org/en/S/RES/2728\(2024\)](https://docs.un.org/en/S/RES/2728(2024)); UN Security Council, Resolution 2735, S/RES/2735(2024) (10 June 2024), [https://docs.un.org/en/S/RES/2735\(2024\)](https://docs.un.org/en/S/RES/2735(2024)); Letter from the Secretary-General addressed to the President of the Security Council, 6 December 2023, S/2023/962, <https://docs.un.org/en/S/2023/962>; ⁴ *Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (South Africa v. Israel)*, Provisional Measures, Order of 26 January 2024; *Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (South Africa v. Israel)*, Request for the modification of the Order of 26 January 2024 indicating provisional measures, Order of 28 March 2024, para. 51 (2) (a); Statement of UNRWA Commissioner-General Philippe Lazzarini to the United Nations General Assembly, 06 November 2024, <https://reliefweb.int/report/occupied-palestinian-territory/statement-unrwa-commissioner-general-philippe-lazzarini-united-nations-general->

2. By bombing, invading and destroying the facilities of UN organs and international NGOs, and those constructed with the development assistance of Third States, in the Gaza Strip and the West Bank, including East Jerusalem, including funded projects, with the effect of forcing them to shut down or drastically reduce the provision of humanitarian and or development assistance to the Palestinian civilian population.⁵

assembly-06-november-2024-enar; Report of the Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel, UN Doc A/HRC/56/26, 14 June 2024, <https://docs.un.org/en/A/HRC/56/26>; Defense minister announces ‘complete siege’ of Gaza: No power, food or fuel, Times of Israel, 9 October 2023, https://www.timesofisrael.com/liveblog_entry/defense-minister-announces-complete-siege-of-gaza-no-power-food-or-fuel/; Israel minister condemned for saying starvation of millions in Gaza might be ‘justified and moral’, The Guardian, 8 August 2024, <https://www.theguardian.com/world/article/2024/aug/08/israel-finance-minister-bezalel-smotrich-gaza-starve-2m-people-comments>; Israeli Minister Blocks Flour From Reaching UNRWA in Gaza, The New York Times, 14 February 2025, <https://www.nytimes.com/2024/02/14/world/middleeast/israel-unrwa-gaza.html>; Israel's far-right minister says humanitarian aid that enters Gaza must be reduced, Anadolu Agency, 7 June 2024, <https://www.aa.com.tr/en/middle-east/israels-far-right-minister-says-humanitarian-aid-that-enters-gaza-must-be-reduced/3243069>.

⁵ UN OCHA, *Humanitarian Situation Update #282 | Gaza Strip*, OCHA, 23 April 2025, <https://www.ochaopt.org/content/humanitarian-situation-update-282-gaza-strip>; Written Statement of the State of Palestine (28 February 2025), paras. 4.63 and 6.14. See further, e.g., UNRWA, *UNRWA Situation Report #167 on the Humanitarian Crisis in the Gaza Strip and the West Bank, including East Jerusalem* (17 April 2025), <https://www.unrwa.org/resources/reports/unrwa-situation-report-167-situation-gaza-strip-and-west-bank-including-east-jerusalem>; UN Secretary-General, António Guterres, @antonioguterres (3:51 pm, 9 April 2025), <https://x.com/antonioguterres/status/1909982529974677939>; UN News, *Gaza war: UN World Food Programme condemns Israeli attack on aid convoy* (6 January 2025), <https://news.un.org/en/story/2025/01/1158746>; UNRWA Commissioner Philippe Lazzarini, @UNLazzarini (10:12 pm, 9 September 2024), <https://x.com/UNLazzarini/status/1833252181539016856>; UNRWA, @UNRWA (9:53 pm, 14 October 2024), <https://x.com/UNRWA/status/1845930999416533406?s=08>; UNRWA, @UNRWA (2:51 pm, 4 April 2024), <https://x.com/UNRWA/status/1775883835818782877?s=08>; UNRWA, @UNRWA (1:00 pm, 15 March 2024), <https://x.com/UNRWA/status/1768623425004658822?s=08>; UNRWA, @UNRWA (3:10 pm, 13 March 2024), <https://x.com/UNRWA/status/1767931166097609064?s=08>; UNRWA, @UNRWA (4: 47 pm, 13 March 2024), <https://x.com/UNRWA/status/1767970869848969614>; UN Human Rights Palestine, @OHCHR_Palestine (5:16 pm, 1 March 2024), https://x.com/OHCHR_Palestine/status/1763614203963691409; UN HRC, *Detailed findings on the military operations and attacks carried out in the Occupied Palestinian Territory from 7 October to 31 December 2023*, *Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel*, UN Doc A/HRC/56/CRP.4 (10 June 2024), paras. 201, 403 and 434, <https://tinyurl.com/mrfsn364>; UN HRC, *Report of the Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel*, UN Doc A/HRC/56/26 (14 June 2024), para 71, <https://docs.un.org/en/A/HRC/56/26>; UN News, *Gaza death toll passes 45,000 as UN school suffers new deadly strike* (16 December 2024), <https://news.un.org/en/story/2024/12/1158206>; UNRWA, @UNRWA (11:38 am, 17 December 2024), <https://x.com/UNRWA/status/1868984223647871258>; UNRWA, @UNRWA (3:48 pm, 15 February 2025), <https://x.com/UNRWA/status/1758156390684557777>; UNRWA, @UNRWA (1:45 pm, 6 February 2025), <https://x.com/UNRWA/status/1754863818839069139>; UNISPAL, *Statement by the UN Human Rights Office in the Occupied Palestinian Territory on the developments in Gaza*, (21 March 2025), <https://www.un.org/unispal/document/statement-by-the-un-human-rights-office-in-the-occupied-palestinian-territory-on-the-developments-in-gaza-21-march-2025/>; UN Office of the Spokesperson for the UN Secretary-General, *Highlights of the Noon Briefing by Stéphane Dujarric, Spokesman For Secretary-General António Guterres* (2 April 2025), <https://www.un.org/sg/en/content/highlight/2025-04-02.html>; UNRWA, @UNRWA (11:42 am, 14 April 2025), <https://x.com/UNRWA/status/1911731712536559827>; UNRWA, *UNRWA Situation Report #167 on the Humanitarian Crisis in the Gaza Strip and the West Bank, including East Jerusalem* (17 April 2025), <https://www.unrwa.org/resources/reports/unrwa-situation-report-167-situation-gaza-strip-and-west-bank-including-east-jerusalem>; UN News, *Fear and uncertainty are daily staples for Gaza's most vulnerable* (9 April 2025), <https://news.un.org/en/story/2025/04/1162031>; Younis Tirawi @ytirawi (12:50 pm, 23 April 2025),

3. By attacking and killing hundreds of their employees and staff and making it unsafe for the rest to continue performing their humanitarian or developmental duties in Gaza or the West Bank, including East Jerusalem.⁶
4. By enacting legislation and administrative regulations to prevent or restrict the operations of these organs, entities and States in the Occupied Palestinian Territory.⁷

<https://x.com/ytirawi/status/1915010445221544283>; Ben van der Merwe and Michelle Inez Simon, Data & Forensics, Celine Al Khaldi and Sky's Gaza team, "Analysis: Two hours of terror: Sky News investigation reveals how Israel's deadly attack on aid workers unfolded", *Sky News* (22 April 2025), <https://news.sky.com/story/two-hours-of-terror-sky-news-investigation-reveals-how-israels-deadly-attack-on-aid-workers-unfolded-13348776>; Ben van der Merwe, "Israeli troops shot at Gaza aid workers from 'point-blank range', leaked documents reportedly show", *Sky News* (23 April 2025), <https://news.sky.com/story/israeli-troops-shot-at-gaza-aid-workers-from-point-blank-range-leaked-documents-reportedly-show-13354441>.

⁶ UN OCHA, *Humanitarian Situation Update #282 | Gaza Strip*, OCHA, 23 April 2025, <https://www.ochaopt.org/content/humanitarian-situation-update-282-gaza-strip>; UNRWA, *UNRWA Situation Report #167 on the Humanitarian Crisis in the Gaza Strip and the West Bank, including East Jerusalem* (17 April 2025), <https://www.unrwa.org/resources/reports/unrwa-situation-report-167-situation-gaza-strip-and-west-bank-including-east-jerusalem>; UN News, *Fear and uncertainty are daily staples for Gaza's most vulnerable* (9 April 2025), <https://news.un.org/en/story/2025/04/1162031>; Younis Tirawi @ytirawi (12:50 pm, 23 April 2025), <https://x.com/ytirawi/status/1915010445221544283>; Ben van der Merwe and Michelle Inez Simon, Data & Forensics, Celine Al Khaldi and Sky's Gaza team, "Analysis: Two hours of terror: Sky News investigation reveals how Israel's deadly attack on aid workers unfolded", *Sky News* (22 April 2025), <https://news.sky.com/story/two-hours-of-terror-sky-news-investigation-reveals-how-israels-deadly-attack-on-aid-workers-unfolded-13348776>; Ben van der Merwe, "Israeli troops shot at Gaza aid workers from 'point-blank range', leaked documents reportedly show", *Sky News* (23 April 2025), <https://news.sky.com/story/israeli-troops-shot-at-gaza-aid-workers-from-point-blank-range-leaked-documents-reportedly-show-13354441>; *Gaza has become a "mass grave" for Palestinians and those helping them*, Médecins Sans Frontières (MSF), 16 April 2025, <https://www.msf.org/gaza-has-become-mass-grave-palestinians-and-those-helping-them>

⁷ See Law to Cease UNRWA Operations and Law to Cease UNRWA Operations in the Territory of the State of Israel, set out in identical letters dated 9 December 2024 from the Secretary-General addressed to the President of the General Assembly and the President of the Security Council, A/79/684-S/2024/892 (10 December 2024), <https://docs.un.org/S/2024/892>; UN Meetings Coverage and Press Releases, *Security Council Press Statement on United Nations Relief and Works Agency for Palestine Refugees in Near East (UNRWA)* (30 October 2024), <https://press.un.org/en/2024/sc15874.doc.htm>; Oxfam Policy and Practice, *Inflicting Unprecedented Suffering and Destruction: Seven ways the government of Israel is deliberately blocking and/or undermining the international humanitarian response in the Gaza Strip* (15 March 2024), <https://policy-practice.oxfam.org/resources/inflicting-unprecedented-suffering-and-destruction-seven-ways-the-government-of-621591/>; "With new ICJ Hearings Set to Begin on Monday 28 April: Israeli Supreme Court rejects second request to halt anti-UNRWA laws as six UNRWA schools face closure in occupied East Jerusalem. Adalah: Court's failure to act demands urgent international intervention", Adalah website, 24 April 2025, <https://www.adalah.org/en/content/view/11239>; Occupied Palestinian Territory (OPT): West Bank, Protection Analysis Update, Update on Protection Risks and Trends, Global Protection Cluster, March 2025, https://globalprotectioncluster.org/sites/default/files/2025-03/occupied_palestinian_territory_-_west_bank_-_protection_analysis_update_march_2025.pdf; Etay Epshtain, @EpshtainItay, (12:07 PM, 11 March 2025) <https://x.com/EpshtainItay/status/1899416793371852967>; Lawmakers debate controversial 80% tax bill on foreign government donations to NGOs, Times of Israel, 5 May 2025, <https://www.timesofisrael.com/lawmakers-debate-controversial-80-tax-bill-on-foreign-government-donations-to-ngos/>; Briefing by UNRWA Commissioner-General Philippe Lazzarini to the European Parliamentary Committees on Foreign Affairs and Development; 17 March 2025, <https://www.unrwa.org/newsroom/official-statements/briefing-unrwa-commissioner-general-philippe-lazzarini-european-parliamentary-committees>; Press remarks by UNRWA Commissioner-General Philippe Lazzarini, 10 March 2025, <https://www.unrwa.org/newsroom/official-statements/press-remarks-unrwa-commissioner-general-philippe-lazzarini-0>

5. By adopting a blockade, on 2 March 2025, to prevent all essential goods necessary to the survival of the Palestinian civilian population (including food, water, fuel, electricity, medicines, clothing, bedding, etc.), and all humanitarian assistance and all commercial goods, from entering the Gaza Strip,⁸ as well as bombing and targeting objects indispensable to the survival of the civilian population in the Gaza Strip.⁹

⁸ See Government of Israel, “Prime Minister’s Office Announcement”, *gov.il*, 2 March 2025 (<https://www.gov.il/en/pages/spoke-part020325>); Bezalet Smotrich, X, 2 March 2025 (<https://x.com/bezaletsm/status/1896110709269823511>); Israel Katz, X, 19 March 2025 (https://x.com/Israel_katz/status/1902388250053861589); Eli Cohen, X, 9 March 2025 (<https://x.com/elico1/status/1898756463222260177>); “Israel announces halt to its supply of power to Gaza, in bid to pressure Hamas”, *The Times of Israel*, 9 March 2025 (<https://www.timesofisrael.com/israel-stops-electricity-supply-to-gaza-in-bid-to-ratchet-up-pressure-on-hamas/>); “Israel halts electricity supply to Gaza in bid to pressure Hamas”, *BBC News*, 9 March 2025 (<https://www.bbc.co.uk/news/articles/c1w0l3q4zd0o>); “What does Israel cutting off Gaza’s electricity mean?”, *Al Jazeera*, 10 March 2025 (<https://www.aljazeera.com/news/2025/3/10/what-does-israel-cutting-off-gazas-power-mean>); Mr. Tom Fletcher, Under-Secretary-General for Humanitarian Affairs and Emergency Relief Coordinator, briefing to the Security Council on the humanitarian situation in the Occupied Palestinian Territory, *ReliefWeb*, 18 March 2025 (<https://reliefweb.int/report/occupied-palestinian-territory/mr-tom-fletcher-under-secretary-general-humanitarian-affairs-and-emergency-relief-coordinator-briefing-security-council-humanitarian-situation-occupied-palestinian-territory-18-march-2025>]). Statement by the Humanitarian Country Team of the Occupied Palestinian Territory – on principled aid delivery in Gaza, 4 May 2025, <https://www.ochaopt.org/content/statement-humanitarian-country-team-occupied-palestinian-territory-principled-aid-delivery-gaza>; Gaza: ‘Worst-case scenario’ unfolds as brutal aid blockade threatens mass starvation, UN News, 2 May 2025, <https://news.un.org/en/story/2025/05/1162851>; [UN] Secretary-General’s remarks to the Security Council – on the Middle East, 29 April 2025, <https://www.un.org/sg/en/content/sg/statement/2025-04-29/secretary-generals-remarks-the-security-council-the-middle-east-delivered-scroll-down-for-all-english-and-all-french>; WFP runs out of food stocks in Gaza as border crossings remain closed, World Food Programme, <https://www.wfp.org/news/wfp-runs-out-food-stocks-gaza-border-crossings-remain-closed>; Statement from UNICEF Executive Director Catherine Russell on the situation for children in the Gaza Strip after two months of aid blockade, UNICEF, 2 May 2025, <https://www.unicef.org/press-releases/statement-unicef-executive-director-catherine-russell-situation-children-gaza-strip>; Humanitarian Situation Update #275: Gaza Strip, OCHA, 25 March 2025, <https://www.ochaopt.org/content/humanitarian-situation-update-275-gaza-strip>; Humanitarian Situation Update #280: Gaza Strip, OCHA, 15 April 2025, <https://www.ochaopt.org/content/humanitarian-situation-update-280-gaza-strip>; UN Under-Secretary-General For Humanitarian Affairs and Emergency Relief Tom Fletcher, @UNReliefChief, (8:26 PM, 7 April 2025), <https://x.com/UNReliefChief/status/1909311792339108095>; Israel and the occupied territories: After two months of aid blockade, humanitarian response in Gaza on verge of total collapse, ICRC, 2 May 2025, <https://www.icrc.org/en/news-release/israel-and-occupied-territories-after-two-months-aid-blockade-humanitarian-response-verge-collapse#:~:text=The%20ICRC%20remains%20committed%20to,and%20protected%20in%20all%20circumstances>.

⁹ As reported by UN Human Rights Chief Volker Türk: “Since 2 March, Israel has prevented the entry of food, fuel and other life-saving assistance to Gaza. Bakeries have now stopped working as flour and fuel have run out, and the remaining stocks of food are being rapidly depleted. Meanwhile, Israeli forces have continued to target civilian objects indispensable to the survival of the population. On 21 and 22 April, they conducted apparently coordinated attacks in three governorates, destroying 36 heavy machines, including excavators, water trucks and sewer suction tanks. These were used for relief operations, such as removing debris, distributing water and repairing sanitation systems... the cumulative impact of Israeli forces’ conduct in Gaza raises serious concerns that Israel appears to be inflicting on Palestinians in Gaza conditions of life increasingly incompatible with their continued existence as a group in Gaza.” See: Türk calls on world to prevent total humanitarian catastrophe in Gaza, 29 April 2025: <https://www.ohchr.org/en/press-releases/2025/04/turk-calls-world-prevent-total-humanitarian-catastrophe-gaza#:~:text=GENEVA%20-%20UN%20Human%20Rights%20Chief,in%20shelters%20and%20health%20facilities>

Part Two

1.5. In consequence, since 2 March 2025, none of the United Nations entities, international organizations or Third States identified herein has been able to bring humanitarian aid or developmental assistance into the Gaza Strip.

1.6. As reported by the heads of UN OCHA, UNICEF, UNRWA, UNP, and WFP in a joint statement issued in April 2025:

“For over a month, no commercial or humanitarian supplies have entered Gaza. More than 2.1 million people are trapped, bombed and starved again, while, at crossing points, food, medicine, fuel and shelter supplies are piling up, and vital equipment is stuck. Over 1,000 children have reportedly been killed or injured in just the first week after the breakdown of the ceasefire, the highest one-week death toll among children in Gaza in the past year. Just a few days ago, the 25 bakeries supported by the World Food Programme during the ceasefire had to close due to flour and cooking gas shortages. The partially functional health system is overwhelmed. Essential medical and trauma supplies are rapidly running out, threatening to reverse hard-won progress in keeping the health system operational.

The latest ceasefire allowed us to achieve in 60 days what bombs, obstruction and lootings prevented us from doing in 470 days of war: life-saving supplies reaching nearly every part of Gaza. While this offered a short respite, assertions that there is now enough food to feed all Palestinians in Gaza are far from the reality on the ground, and commodities are running extremely low. We are witnessing acts of war in Gaza that show an utter disregard for human life.

New Israeli displacement orders have forced hundreds of thousands of Palestinians to flee yet again, with no safe place to go. No one is safe. At least 408 humanitarian workers, including over 280 from UNRWA, have been killed since October 2023. With the tightened Israeli blockade on Gaza now in its second month, we appeal to world leaders to act – firmly, urgently and decisively – to ensure the basic principles of international humanitarian law are upheld. Protect civilians. Facilitate aid. Release hostages. Renew a ceasefire.”¹⁰

¹⁰ AlJazeera Correspondent Gabriel Elizondo, @elizondogabriel, (5:53 PM, 7 April 2025) <https://x.com/elizondogabriel/status/1909273386099880283?s=46&t=hnLZ1OQP4wStXt99MP64Yg>

1.7. The Under-Secretary-General for Humanitarian Affairs reported, with respect to the delivery of humanitarian aid after 2 March 2025, that: “We are being deliberately blocked from saving lives in Gaza, and so civilians are dying.”¹¹ He further stated:

“[I]nternational law is unequivocal: As the occupying power, Israel must allow humanitarian support in. Aid, and the civilian lives it saves, should never be a bargaining chip. Blocking aid starves civilians. It leaves them without basic medical support. It strips them of dignity and hope. It inflicts a cruel collective punishment. Blocking aid kills. To the Israeli authorities, and those who can still reason with them, we say again: lift this brutal blockade. Let humanitarians save lives. To the civilians left unprotected, no apology can suffice. But I am truly sorry that we are unable to move the international community to prevent this injustice. We won’t give up, even if the world has given you every reason to give up on us.”¹²

1.8. In addition to the measures listed above, Israel’s displacement orders, requiring the forcible displacement of nearly two million Palestinian civilians, most of them on multiple occasions, have also prevented the humanitarian actors listed herein from delivering humanitarian aid and developmental assistance to the civilian population in the Gaza Strip.¹³ Since 18 March, Israel has placed about 70 per cent of the Gaza Strip under displacement

¹¹ UN Under-Secretary-General For Humanitarian Affairs and Emergency Relief Tom Fletcher, @UNReliefChief, (8:26 PM, 7 April 2025), <https://x.com/UNReliefChief/status/1909311792339108095>

¹² Statement on Gaza by Tom Fletcher, Under-Secretary-General for Humanitarian Affairs and Emergency Relief Coordinator, 1 May 2025, <https://www.ochaopt.org/content/statement-gaza-tom-fletcher-under-secretary-general-humanitarian-affairs-and-emergency-relief-coordinator-0>

¹³ UNRWA Situation Report #154 on the Humanitarian Crisis in the Gaza Strip and the West Bank, including East Jerusalem, 4 January 2025, <https://www.unrwa.org/resources/reports/unrwa-situation-report-154-humanitarian-crisis-gaza-strip-and-west-bank-including>; Netanyahu says Gaza population to be moved in intensive Israeli operation, AlJazeera, 5 May 2025, <https://www.aljazeera.com/news/2025/5/5/israel-plans-conquest-of-gaza-in-expanded-offensive>; UNRWA Situation Report #118 on the situation in the Gaza Strip and the West Bank, including East Jerusalem, UNRWA, 5 July 2024, <https://www.unrwa.org/resources/reports/unrwa-situation-report-118-situation-gaza-strip-and-west-bank-including-east-jerusalem>; Gaza: Deep concerns about the forced displacement of Palestinians, OHCHR, 28 March 2025, <https://www.ohchr.org/en/press-releases/2025/03/gaza-deep-concerns-about-forced-displacement-palestinians>; Gaza: Increasing Israeli “evacuation orders” lead to forcible transfer of Palestinians, OHCHR, 11 April 2025, <https://www.ohchr.org/en/press-briefing-notes/2025/04/gaza-increasing-israeli-evacuation-orders-lead-forcible-transfer>; Northern Gaza: Aid organisations warn of dramatic escalation of humanitarian catastrophe following further mass forced displacement of civilians, Norwegian Refugee Council (NRC), 9 October 2024, <https://www.nrc.no/news/2024/october/northern-gaza-aid-organisations-warn-of-dramatic-escalation-of-humanitarian-catastrophe-following-further-mass-forced-displacement-of-civilians>; About 90% of people in Gaza displaced since war began, says UN agency, The Guardian, 3 July 2024, <https://www.theguardian.com/world/article/2024/jul/03/about-90-of-people-in-gaza-displaced-since-war-began-says-un-agency>; As Israel’s Aerial Bombardments Intensify, ‘There Is No Safe Place in Gaza’, Humanitarian Affairs Chief Warns Security Council, UNSC 9531st Meeting, UN DocSC/15564, 12 January 2024, <https://www.un.org/unispal/document/as-israels-aerial-bombardments-intensify-there-is-no-safe-place-in-gaza-humanitarian-affairs-chief-warns-security-council-12jan2024/>

orders, within the “no-go” zone or both, including 100 percent of Rafah as a no-go zone.¹⁴ As OCHA reported in April:

“Most attempts to coordinate humanitarian movements to about two-thirds of the Gaza Strip territory designated as “no-go” zones or placed under displacement orders have been denied, especially for aid delivery which is often blocked. Given restricted access, there are no clear estimates of the number of people who remain in these areas.”¹⁵

1.9. Israel’s displacement orders have severely restricted access to humanitarian and life-saving aid to children:

“According to the Child Protection (CP) Area of Responsibility (AoR), 20 child friendly spaces in the “no-go” zones and areas slated for displacement have been forced to suspend activities between 18 March and 30 April. Combined with the displacement of many staff of aid organizations providing services, this has disrupted the provision of basic psychosocial support, explosive ordnance risk education, and case management for children at heightened risk of harm. Moreover, since 18 March, about 55 per cent of TLS (259 out of 570), which served more than 140,000 children, have been paused due to insecurity, alongside 90 governmental schools that had re-opened during the ceasefire and served more than 90,000 children. This is in addition to the closure of 171 TLS, or 30 per cent of those established during the first quarter of 2025, due to funding constraints. According to the Education Cluster, shrinking education services deprive children not only of learning but also of access to mental health and psychosocial support as well as emotional learning and recreational activities. This effectively removes safe spaces created to support children exposed to trauma, stress and anxiety, creating additional distress, while also cutting them off from the peer and adult network essential for their well-being and resilience.”¹⁶

1.10. Israel has also further restricted the activities of the humanitarian and developmental actors listed herein by failing to provide any effective deconfliction mechanism throughout the past 18 months and especially since 2 March 2025, which is essential to the provision of humanitarian aid and development assistance within Gaza. According to the Under-Secretary-General for Humanitarian Affairs:

¹⁴ Humanitarian Situation Update #284: Gaza Strip, OCHA, 30 April 2025, <https://www.ochaopt.org/content/humanitarian-situation-update-284-gaza-strip>

¹⁵ Humanitarian Situation Update #278: Gaza Strip, OCHA, 8 April 2025, <https://www.ochaopt.org/content/humanitarian-situation-update-278-gaza-strip>

¹⁶ Humanitarian Situation Update #284: Gaza Strip, OCHA, 30 April 2025, <https://www.unocha.org/publications/report/occupied-palestinian-territory/humanitarian-situation-update-284-gaza-strip-enar#:~:text=Moreover%2C%20since%2018%20March%2C%20about,served%20more%20than%2090%2C000%20children.>

“One thing we have not been able to do like we did in the past is work with Israeli authorities to do what we call deconfliction which is to try to make sure that humanitarian convoys are clearly notified and avoided. That was not always happening the past and certainly not happening now ...It has been a month since we were allowed to get aid in. We have stopped from delivering aid and told we are not allowed there is tiny fraction of aid of what is needed to stop mass starvation and diseases and it is happening before eyes.”¹⁷

1.11. Most recently - since the conclusion of the oral hearings on 2 May - Israel has announced an alarming new policy pursuant to which it plans to shut down the existing aid delivery and distribution system in the Gaza Strip, and to replace it with one run by Israel itself. Under this scheme, humanitarian aid would be provided by the Israeli military, with distribution to the civilian population carried out, under military supervision, by private contractors of Israel’s own choosing.¹⁸ This scheme, which Israel seems determined to impose, has been condemned as unworkable by the United Nations and other experienced international humanitarian and development organizations. According to UN OCHA:

“For nine weeks now, Israeli authorities have blocked all supplies from entering Gaza, no matter how vital to people’s survival. Bakeries have shut. Community kitchens have closed. Warehouses stand empty. Children have gone hungry.

Israeli officials have sought to shut down the existing aid distribution system run by the United Nations and its humanitarian partners and have us agree to deliver supplies through Israeli hubs under conditions set by the Israeli military, once the government agrees to re-open crossings.

The design of the plan presented to us will mean large parts of Gaza, including the less mobile and most vulnerable people, will continue to go without supplies. It contravenes fundamental humanitarian principles and appears designed to reinforce control over life-sustaining items as a pressure tactic – as part of a military strategy. It is dangerous,

¹⁷ Israel want to 'completely control the delivery of aid', says UN Under-Secretary-General, Sky News, 3 April 2025, (1:15-7:08), https://www.youtube.com/watch?v=cw-_VFjfmSs

¹⁸ Humanitarian Situation Update #278: Gaza Strip, OCHA, 8 April 2025, <https://www.ochaopt.org/content/humanitarian-situation-update-278-gaza-strip>; The Secretary-General – remarks to the press on Gaza, OCHA, 8 April 2025, <https://www.ochaopt.org/content/secretary-general-remarks-press-gaza>; Statement on Gaza by Tom Fletcher, Under-Secretary-General for Humanitarian Affairs and Emergency Relief Coordinator, OCHA, 1 May 2025, <https://www.ochaopt.org/content/statement-gaza-tom-fletcher-under-secretary-general-humanitarian-affairs-and-emergency-relief-coordinator-0>; Netanyahu says Gaza population to be moved in intensive Israeli operation, AlJazeera, 5 May 2025, <https://www.aljazeera.com/news/2025/5/5/israel-plans-conquest-of-gaza-in-expanded-offensive>; Far-right minister says Israel should bomb humanitarian aid, ‘starve’ Gazans, Times of Israel, 6 May 2025, <https://www.timesofisrael.com/far-right-minister-says-israel-should-bomb-humanitarian-aid-starve-gazans/>

driving civilians into militarized zones to collect rations, threatening lives, including those of humanitarian workers, while further entrenching forced displacement.”¹⁹

1.12. UN OCHA concluded:

“This new mechanism to deliver aid is the textbook definition of weaponizing aid. It would be impossible for aid groups to adhere to humanitarian principles and essentially go back to calorie counting.”²⁰

1.13. According to the UN Secretary General :

“[T]he Israeli authorities newly proposed “authorization mechanisms” for aid delivery risk further controlling and callously limiting aid down to the last calorie and grain of flour. Let me be clear: We will not participate in any arrangement that does not fully respect the humanitarian principles: humanity, impartiality, independence and neutrality... The world may be running out of words to describe the situation in Gaza, but we will never run away from the truth.”²¹

1.14. International NGO’s agreed with the UN’s rejection of Israel’s new plan. According to the Head of Humanitarian Policy and Advocacy at Save the Children: “[t]his new mechanism to deliver aid is the textbook definition of weaponizing aid. It would be impossible for aid groups to adhere to humanitarian principles and essentially go back to calorie counting.”²²

1.15. Just two days ago, on 5 May 2025, the Israeli Knesset advanced a bill that would levy an 80 percent tax on NGOs funded by Third States, targeting many of the entities that provide assistance throughout the OPT, in an effort to deprive them of the funds they need to continue operating.²³ This follows restrictions already adopted and implemented, including onerous registration requirements, restrictions on speech by officials and staff, and harassment and detention of humanitarian workers. In response, on 6 May 2025, 55 organizations issued a statement calling Israel’s measures a “grave threat to humanitarian operations and international law.” The organizations declared:

¹⁹ Statement by the Humanitarian Country Team of the Occupied Palestinian Territory – on principled aid delivery in Gaza, OCHA, 4 May 2025 <https://www.ochaopt.org/content/statement-humanitarian-country-team-occupied-palestinian-territory-principled-aid-delivery-gaza>

²⁰ Head of Humanitarian Policy & Advocacy, Save the Children International Alexandra Saieh, @alex_saieh, (5:29 PM, 2 May 2025), https://x.com/alex_saieh/status/1918327016811630911

²¹ The Secretary-General – remarks to the press on Gaza, OCHA, 8 April 2025, <https://www.ochaopt.org/content/secretary-general-remarks-press-gaza>

²² Head of Humanitarian Policy & Advocacy, Save the Children International Alexandra Saieh, @alex_saieh, (5:29 PM, 2 May 2025), https://x.com/alex_saieh/status/1918327016811630911

²³ Lawmakers debate controversial 80% tax bill on foreign government donations to NGOs, Times of Israel, 5 May 2025, <https://www.timesofisrael.com/lawmakers-debate-controversial-80-tax-bill-on-foreign-government-donations-to-ngos/>

“The undersigned 55 organisations operating in Israel and the occupied Palestinian territory (oPt) call for urgent action from the international community against new Israeli registration rules for international NGOs. Based on vague, broad, politicised, and open-ended criteria, these rules appear designed to assert control over independent humanitarian, development and peacebuilding operations, silence advocacy grounded in international humanitarian and human rights law, and further entrench Israeli control and de facto annexation of the occupied Palestinian territory....By framing humanitarian and human rights advocacy as a threat to the state, Israeli authorities can shut out organisations merely for speaking out about conditions they witness on the ground, forcing INGOs to choose between delivering aid and promoting respect for the protections owed to affected people...INGOs are further required to submit complete staff lists and other sensitive information about staff and their families to Israel when applying for registration. In a context where humanitarian and healthcare workers are routinely subject to harassment, detention, and direct attacks, this raises serious protection concerns...These new rules are part of a broader, long-term crackdown on humanitarian and civic space marked by heightened surveillance and attacks, and a series of actions that restrict humanitarian access, compromise staff safety, and undermine core principles of humanitarian action.”²⁴

1.16. These restrictions apply throughout the OPT, including in the West Bank, including East Jerusalem, where the humanitarian crisis is also alarming. OCHA has reported:

“All Israeli settlements in the Occupied Palestinian Territory are illegal under international humanitarian law. They deepen humanitarian needs by affecting livelihoods, food security and access to essential services.”²⁵

1.22 OHCHR has warned that:

“The humanitarian context in the occupied West Bank, including East Jerusalem, is characterized by heightened volatility and a severe increase in protection risks...Incidents of settler violence are increasing in intensity and frequency across the West Bank. These are linked closely with Israeli state-sponsored arms proliferation and mobilization campaigns and include growing involvement of Israeli forces (IF)...These developments have triggered a convergence between state and settler violence, particularly in Area C, where systemic discrimination, discriminatory zoning and planning laws, and violence against Palestinian agricultural and herding communities exacerbate displacement and dispossession.”²⁶

²⁴ Israel’s New INGO Registration Measures Are a Grave Threat to Humanitarian Operations and International Law – 55 Organisations Say, ReliefWeb, 6 May 2025, <https://reliefweb.int/report/occupied-palestinian-territory/israels-new-ingo-registration-measures-are-grave-threat-humanitarian-operations-and-international-law-55-organisations-say-6-may-2025>

²⁵ Humanitarian Situation Update #274: West Bank, OCHA, 20 March 2025, <https://www.ochaopt.org/content/humanitarian-situation-update-274-west-bank>

²⁶ Occupied Palestinian Territory (OPT): West Bank, Protection Analysis Update, Update on Protection Risks and Trends, Global Protection Cluster, March 2025,

1.17. Israel’s restrictions on humanitarian aid and development assistance, affecting all of the humanitarian actors identified herein, have aggravated this situation: OHCHR has reported that:

“[T]he imposition of increasingly restrictive conditions for humanitarian response actors through targeted measures such as denying visas, permits, and access, has contributed to a repressive environment and constricting humanitarian and civil society space, with significant ramifications for communities in urgent need of protection. Cases of killing, arrests and deportations of protective presence and human rights defenders has led to a chilling effect on access.”

“Additional Israeli bureaucratic and administrative impediments have been implemented by authorities, including a December 2024 announcement by the GOI further restricting visas and registrations for INGOs. The new measure is expected to have significant ramifications on INGO operability in OPT, leading to critical staffing gaps, reduced footprint, programmatic disruption, quality and monitoring challenges, and cost increases.”²⁷

1.18. As explained by UNRWA Commissioner-General: “While a number of International NGOs have already been silenced, there is now a larger, concerted effort in Israel to undermine, or restrict through legislative measures, the operations of international organisations and NGOs.”²⁸

1.19. In conclusion, Israel’s restrictions on humanitarian and development assistance apply to all UN organs, other international organizations – including INGOs – and Third States that operate within the OPT as authorized by the State of Palestine. As indicated above, Israel continues to devise and impose new restrictions, including since the conclusion of the oral hearings on 2 May, to further prevent humanitarian actors from providing the good and services required for the survival and sustenance of the Palestinian civilian population, in flagrant breach of international law.

https://globalprotectioncluster.org/sites/default/files/2025-03/occupied_palestinian_territory_-_west_bank_-_protection_analysis_update_march_2025.pdf

²⁷ Occupied Palestinian Territory (OPT): West Bank, Protection Analysis Update, Update on Protection Risks and Trends, Global Protection Cluster, March 2025, https://globalprotectioncluster.org/sites/default/files/2025-03/occupied_palestinian_territory_-_west_bank_-_protection_analysis_update_march_2025.pdf

²⁸ Press Remarks by UNRWA Commissioner-General Philippe Lazzarini, 10 March 2025: <https://www.unrwa.org/newsroom/official-statements/press-remarks-unrwa-commissioner-general-philippe-lazzarini-0>

Annex I

List of United Nations entities in the OPT

1.	Food and Agricultural Organization
2.	International Fund for Agricultural Development
3.	International Labor Organization
4.	International Trade Center
5.	UN Department of Safety and Security
6.	UN Development Program
7.	UN Educational, Scientific and Cultural Organization
8.	UN Environmental Programme
9.	UN Habitat
10.	UN Industrial Development Organization
11.	UN International Children's Fund
12.	UN Mine Action Service
13.	UN Office for the Coordination of Humanitarian Affairs
14.	UN Office of the High Commissioner of Human Rights

15.	UN Office on Drugs and Crime
16.	UN Populations Fund
17.	UN Project Services
18.	UN Register of Damage Caused by the Construction of the Wall in the Occupied Palestinian Territory
19.	UN Special Coordinator for the Middle East Peace Process
20.	UN Trade and Development
21.	UN Women
22.	World Food Programme
23.	World Health Organization
24.	UNRWA

Annex II

List of International Non-Governmental Organizations

1.	Acted
2.	Action Against Hunger, ACF
3.	Action Aid Australia - Palestine
4.	AlianzaPor La Solidaridad
5.	ANERA
6.	CARE International
7.	Caritas Jerusalem
8.	Catholic Relief Services, CRS
9.	CESVI
10.	<i>Cooperazione Internazionale Sud Sud</i>
11.	Dan Church Aid/Norwegian Church Aid
12.	Danish Refugee Council
13.	Diakoniekatastrophenhilfe, DKH
14.	Global Communities - Palestine
15.	Humanity and Inclusion
16.	International Medical Corps, IMC
17.	International Rescue Committee
18.	Lutheran World Federation, LWF
19.	Médecins sans Frontières France (Observer)
20.	Medecins Sans Frontieres Spain
21.	Medical Aid for Palestinians, MAP
22.	Mercy Corps, MC
23.	Middle East Children's Alliance
24.	Norwegian Aid Committee
25.	Norwegian Peoples' Aid, NPA
26.	Norwegian Refugee Council, NRC
27.	Oxfam
28.	Première Urgence Internationale, PUI
29.	Project HOPE
30.	Relief International, RI
31.	Save the Children, SCI
32.	Solidarités International, SI
33.	Swiss Church Aid, HEKS EPER
34.	Terre des Hommes Italia Onlus

35.	Terre des Hommes Lausanne
36.	The Centre for Mind-Body Medicine
37.	War Child
38.	War Child Holland
39.	We World-GVC

Annex II

List of International Development Agencies

1.	1.20. DCAF-Geneva Centre for Security Sector Governance
2.	1.21. ENABEL-Belgian Agency for International Cooperation
3.	1.22. ERASMUS-EU Programme for Education, training, youth and sport
4.	EU Police and Rule of Law Mission for the occupied Palestinian territory
5.	1.23. Deutsche Gesellschaft für Internationale Zusammenarbeit
6.	1.24. International Committee of the Red Cross
7.	1.25. Japanese International Cooperation Agency
8.	1.26. Korean International Cooperation Agency
9.	1.27. Organization of Islamic Cooperation
10.	1.28. Turkish Cooperation and Coordination Agency

Annex III

List of Embassies and Representative Offices

1.	Argentine Republic
2.	Commonwealth of Australia
3.	Republic of Austria
4.	Republic of Azerbaijan
5.	Federative Republic of Brazil
6.	Republic of Bulgaria
7.	Canada
8.	Republic of Chile
9.	People's Republic of China
10.	Republic of Cyprus
11.	Czech Republic
12.	Kingdom of Denmark
13.	Republic of Ecuador
14.	Arab Republic of Egypt
15.	European Union

16.	Republic of Finland
17.	Federal Republic of Germany
18.	Hungary
19.	Republic of India
20.	Ireland
21.	Japan
22.	Hashemite Kingdom of Jordan
23.	Republic of Korea
24.	Republic of Lithuania
25.	Republic of Malta
26.	United Mexican States
27.	Kingdom of Morocco
28.	Kingdom of the Netherlands
29.	Republic of Nicaragua
30.	Kingdom of Norway
31.	Sultanate of Oman
32.	Republic of Poland

33.	Portuguese Republic
34.	Romania
35.	Russian Federation
36.	Republic of Singapore
37.	Slovak Republic
38.	Republic of Slovenia
39.	Republic of South Africa
40.	Sovereign Order of Malta
41.	Democratic Socialist Republic of Sri Lanka
42.	Swiss Confederation
43.	Tunisian Republic
44.	Ukraine
45.	Oriental Republic of Uruguay
46.	Bolivarian Republic of Venezuela

Annex IV

Consulates General

1.	Apostolic Delegation of the Holy See (Vatican)
2.	Kingdom of Belgium
3.	French Republic
4.	Hellenic Republic (Greece)
5.	Italian Republic
6.	Kingdom of Spain
7.	Kingdom of Sweden
8.	Republic of Türkiye
9.	United Kingdom of Great Britain and Northern Ireland

Annex V

Non-Resident Diplomatic Missions

1.	Republic of Afghanistan
2.	Republic of Albania
3.	Republic of Angola
4.	Kingdom of Bahrain
5.	People's Republic of Bangladesh
6.	The Plurinational State of Bolivia
7.	Bosnia and Herzegovina
8.	Republic of Botswana
9.	Sultanate Brunei Darusalam
10.	Burkina Faso
11.	Republic of Congo
12.	Republic of Costa Rica
13.	Republic of Croatia
14.	Republic of Cuba
15.	Republic of Djibouti

16.	Dominican Republic
17.	Republic of El Salvador
18.	United Arab Emirates
19.	Republic of Estonia
20.	Republic of Ghana
21.	Republic of Guinea
22.	Iceland
23.	Republic of Indonesia
24.	Republic of Iraq
25.	Republic of Kazakhstan
26.	Republic of Kenya
27.	Democratic People's Republic of Korea
28.	State of Kuwait
29.	Lao People's Democratic Republic
30.	Republic of Latvia
31.	Republic of Malawi
32.	Malaysia

33.	Republic of Maldives
34.	Republic of Mali
35.	Islamic Republic of Mauritania
36.	Montenegro
37.	Republic of Namibia
38.	New Zealand
39.	Republic of Niger
40.	Republic of Nigeria
41.	Islamic Republic of Pakistan
42.	Republic of Panama
43.	Republic of Paraguay
44.	Republic of the Philippines
45.	Kingdom of Saudi Arabia
46.	Republic of Senegal
47.	Republic of Serbia
48.	Republic of Sudan
49.	Republic of Tajikistan

50.	United Republic of Tanzania
51.	Kingdom of Thailand
52.	Turkmenistan
53.	Republic of Uganda
54.	Socialist Republic of Vietnam
55.	Republic of Zambia
56.	Republic of Zimbabwe

Annex VI

Honorary Consuls

1.	Republic of Chile
2.	Czech Republic
3.	Republic of El Salvador
4.	Co-operative Republic of Guyana
5.	Republic of Honduras
6.	Hungary
7.	Republic of Indonesia
8.	Malaysia
9.	Republic of Malta
10.	Republic of Poland
11.	Slovak Republic
12.	Democratic Socialist Republic of Sri Lanka