



## Security Council

Distr.: General  
1 November 2021

Original: English

---

### **Identical letters dated 1 November 2021 from the Permanent Representative of Israel to the United Nations addressed to the Secretary-General and the President of the Security Council**

I would like to draw the attention of the Security Council to the fact that, on 22 October, in accordance with the Israeli Counter-Terrorism Law of 2016, Israel designated six Palestinian institutions which are an integral part and arm of the Popular Front for the Liberation of Palestine (PFLP), a designated terror organization in Israel, the United States, the European Union, Australia, Canada and Japan.

PFLP, a murderous terror organization, has been responsible for countless terrorist attacks against Israelis and other nationals since its creation. Having pioneered armed aircraft hijackings in the 1960s and 1970s, it has been responsible for or associated with acts of terrorism over the years that have claimed many lives. Such acts have included suicide bombings, hostage-taking, murders and assassinations, for example the massacre in 2011 of five members of the Fogel family (including three children, aged 11 years, 4 years, and 3 months) as they slept in their home; the attack on worshippers in a Jerusalem synagogue in 2014, killing five people, including three United States nationals, and injuring 12; the recent murder in 2019 of 17-year-old Rina Shnerb Z”L; and indiscriminate rocket fire from Gaza on civilian communities, including in the recent round of Gaza violence in May 2021. Many more planned terrorist attacks by PFLP would have resulted in the murder or maiming of innocent civilians had they not been thwarted by the Israeli security services. PFLP has been consistently opposed to any peace or reconciliation with Israel and to the agreements signed between Israel and the Palestine Liberation Organization. Instead, it actively promotes the continuation of the “armed struggle”, and aspires to the establishment of a Palestinian state which will replace the State of Israel.

A detailed investigation conducted by Israeli authorities revealed extensive information as to how PFLP raised funds through a network of institutions, acting under the guise of human rights organizations, including through the six entities designated: the Union of Agricultural Work Committees, Addameer, the Bisan Center, Al-Haq, Defense for Children International – Palestine and the Union of Palestinian Women’s Committees.

This designation is the product of a robust and thorough investigative process by the relevant authorities, in accordance with Israel’s Counter-Terrorism Law of 2016. The designation is based on compelling, extensive and detailed evidence that was thoroughly reviewed and approved by high-ranking government officials and senior legal advisers. Pursuant to the Law, the designation is subject to appeal, and may be reviewed by a committee headed by a retired Supreme or District Court judge, as well as subjected to judicial review by Israel’s High Court of Justice.



PFLP operates an organizational and military apparatus, including a network of purported civilian institutions, which include the six above-mentioned institutions. The aim of this network is to raise, obtain and funnel donations from abroad in order to fund PFLP activities at all levels, including its acts of terror. In order to do so successfully, this network of PFLP institutions operated under the guise of humanitarian aid and human rights activities receiving funding, in exceptional amounts of millions of euros, stemming primarily from Governments of States Members of the United Nations.

These institutions served as a financial lifeline to PFLP, and were deeply involved in money laundering and terrorist financing. They have all engaged in forgery of documents and fraudulent activities, knowingly transferring funds allocated by their foreign donors for the purpose of supporting Palestinian civil society into the hands of a murderous terror organization.

In addition, PFLP used its full control over these institutions to further embed its position in the Palestinian population and advance its capabilities to execute terror attacks by recruiting new agents, creating commitments among the beneficiaries and recipients of their services, as well as disseminating PFLP propaganda. In many of their events, these institutions used PFLP flags, slogans and signs, thus publicly acknowledging the fact that they are part of the PFLP platforms of activity, and supporting the terror organization.

Moreover, these institutions employed known, sometimes self-declared, PFLP operatives, allowing them the benefits of regular salaries and the ability to use their facilities as a safe haven for PFLP activities. Several of these operatives, who were employed in senior positions in these institutions, themselves participated actively in plotting and executing terrorist attacks against Israeli citizens.

The misuse of civil society organizations by terrorist groups is not unprecedented. The Financial Action Task Force, the intergovernmental body that sets international standards (the Financial Action Task Force Recommendations) to prevent and confront money laundering and terrorist financing, has adopted specific recommendations to address this challenge. Recommendation 8 sets out requirements regarding non-profit organizations (NPOs), with the objective of ensuring that non-profit organizations are not misused by terrorist organizations: (a) to pose as legitimate entities; (b) to exploit legitimate entities as conduits for terrorist financing, including for the purpose of escaping asset-freezing measures; or (c) to conceal or obscure the clandestine diversion of funds intended for legitimate purposes, but diverted for terrorist purposes. This recommendation is also echoed in Security Council resolution [2462 \(2019\)](#).

In the interpretive note for Recommendation 8 it is stated that: “Terrorists and terrorist organisations exploit some NPOs in the sector to raise and move funds, provide logistical support, encourage terrorist recruitment, or otherwise support terrorist organisations and operations. As well, there have been cases where terrorists create sham charities or engage in fraudulent fundraising for these purposes. This misuse not only facilitates terrorist activity, but also undermines donor confidence and jeopardises the very integrity of NPOs. Therefore, protecting NPOs from terrorist financing abuse is both a critical component of the global fight against terrorism and a necessary step to preserve the integrity of NPOs and the donor community.” The interpretive note goes on to state that: “Countries are required to identify and take effective and proportionate action against NPOs that either are exploited by, or knowingly supporting, terrorists or terrorist organisations taking into account the specifics of the case. Countries should aim to prevent and prosecute, as appropriate, terrorist financing and other forms of terrorist support. Where NPOs suspected of, or implicated in, terrorist financing or other forms of terrorist support are identified, the

first priority of countries must be to investigate and halt such terrorist financing or support.”<sup>1</sup>

The international requirement to criminalize and prosecute terror funding is also emphasized in Security Council resolution 2462 (2019), in which the following is stated: “All States shall ... ensure that their domestic laws and regulations establish serious criminal offenses sufficient to provide the ability to prosecute and to penalize in a manner duly reflecting the seriousness of the offense the wilful provision or collection of funds, financial assets or economic resources or financial or other related services, directly or indirectly, with the intention that the funds should be used, or in the knowledge that they are to be used for the benefit of terrorist organizations.”

The abuse of civil society and humanitarian activities by these designated institutions for terror purposes endangers the work of Palestinian civil society organizations that are genuinely dedicated to the promotion of civilian projects and humanitarian assistance. By designating these institutions, Israel is vouchsafing that donations made for humanitarian and civilian purposes on the Palestinian side actually fulfil their intended objective.

Simply put, “human rights non-governmental organizations” that raise, launder and funnel funds to terrorist organizations and that employ, support and provide cover for terrorists are themselves, in fact, terrorist organizations abusing their self-proclaimed title and undermining genuine civil society organizations.

Israel’s commitment to combating terrorism, in line with the international conventions to which it is a party, operates alongside its commitment to human rights and the other accepted standards applicable in this field, as provided by international law. Therefore, while Israel attaches value to the work of Palestinian civil society organizations, it cannot allow the financing of terrorism under the pretence of humanitarian and civil assistance. With these recent designations, Israel does not seek to curtail freedom of expression nor limit any humanitarian activity. Israel acts against terror and its channels of funding in order to protect its citizens and society, as it is obligated to do.

Israel expects the international community to condemn this dangerous abuse of civil society organizations, and calls upon all States Members of the United Nations, in accordance with their obligations to prevent terrorism, money laundering and terrorist financing, to immediately halt any further transfers of funds and any other support to these designated institutions.

Lastly, I also would like to express my serious concern with respect to the public campaign conducted by the Palestinian Authority over the past few days in support of these six designated institutions. The efforts expended by the Palestinian Authority in support of these institutions would have been better spent by it working on behalf of the Palestinian population and the international donor community to ensure that these funds were properly invested, and not delivered into the hands of terrorists.

I would be grateful if the present letter could be distributed as a document of the Security Council.

(Signed) Gilad **Erdan**  
Ambassador of Israel to the United States and the United Nations

---

<sup>1</sup> See Financial Action Task Force (2012–2021), *International Standards on Combating Money Laundering and the Financing of Terrorism and Proliferation* (FATF, Paris, France), [www.fatf-gafi.org/recommendations.html](http://www.fatf-gafi.org/recommendations.html).