

**Security Council**

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Letter dated 27 February 2025 from the Permanent Representative of South Africa to the United Nations addressed to the President of the Security Council

I would like to transmit to you a document entitled “Public dossier of openly available evidence on the State of Israel’s acts of genocide against the Palestinians in Gaza, as of 4 February 2025” (see annex).*

I would be grateful if you would have the present letter and its annex issued as a document of the Security Council and brought to the attention of the members of the Council.

(Signed) Mathu Joyini
Permanent Representative of the Republic of South Africa
to the United Nations

* Circulated in the language of submission only.



Annex to the letter dated 27 February 2025 from the Permanent Representative of South Africa to the United Nations addressed to the President of the Security Council

**PUBLIC DOSSIER OF OPENLY AVAILABLE EVIDENCE
ON THE STATE OF ISRAEL'S ACTS OF GENOCIDE AGAINST THE
PALESTINIANS IN GAZA AS AT 4 FEBRUARY 2025**

I. INTRODUCTION

1. This is a Dossier of certain publicly available material collected by South Africa, evidencing genocidal conduct by Israel against Palestinians in Gaza. The body of evidence is large and growing daily – Israel's conduct is continuously scrutinised and condemned by United Nations bodies and other international institutions, the patterns of Israel's breaches of the Convention on the Prevention and Punishment of the Crime of Genocide ('the Genocide Convention') are evident from public information and evidence, and the genocidal statements made by Israeli officials, military officers and others, are stated repeatedly and openly. South Africa has compiled this Dossier with a view to making the international community, including third States that are party to the Genocide Convention, aware of the key factual material that is in the public domain, and which provides clear evidence of Israel's continuous and systematic breaches of the Genocide Convention, and of the provisional measures ordered by the International Court of Justice ('Court' or 'ICJ') on 26 January 2024; 28 March 2024; and 24 May 2024.
2. On 29 May 2024, South Africa submitted a Dossier to the United Nations Security Council in which it set out the background to its approach to the Court and the provisional measures ordered by the Court, a brief overview of the catastrophic and brutal conditions facing some 2.3 million Palestinians following seven months of attacks by Israeli forces, and a summary of the ongoing genocidal statements by Israeli leaders and the Israeli military, and of incitement to genocide by prominent Israeli leaders, officials and public figures.
3. Now, as then, South Africa presents this Dossier for international consideration by members of the United Nations, as part of the obligations upon South Africa and other States, under Article 1 of the Genocide Convention, to act to prevent genocide by assisting in ensuring accountability for genocide and deterring further acts of genocide and the risk thereof, which continue to pose a grave and imminent risk to the rights of Palestinians.
4. South Africa views this Dossier as vital in the light of the escalating assault on the West Bank, contemplated annexation of the West Bank, the furtherance of the genocidal campaign by Israel in Gaza by the open call for ethnic cleansing in Gaza¹, and the growing threat to the foundations of the international rule of law.
5. The Dossier is also important in the light of the report of the United Nations Special Committee to Investigate Israeli Practices Affecting the Human Rights of the Palestinian People and Other Arabs of the Occupied Territories, released on

¹ Aluf Benn, "Analysis | The Demon of Ethnic Cleansing Has Been Let Out of the Bottle in Israel", *Haaretz* (9 February 2025), <https://www.haaretz.com/israel-news/2025-02-09/ty-article/.premium/trump-and-netanyahu-are-fulfilling-a-legacy-of-jewish-supremacy-day-after-transfer/00000194-e71c-dc0f-a7de-ff3c10da0000>; David Smith, "Trump says US will 'take over' Gaza Strip in shock announcement during Netanyahu visit", *The Guardian* (5 February 2025), <https://www.theguardian.com/world/2025/feb/05/donald-trump-plan-to-take-over-gaza-strip-netanyahu-visit>.

14 November 2024.² The Special Committee finds that Israel's war in Gaza is consistent with the characteristics of genocide.

6. The Special Committee makes multiple recommendations for action by the United Nations General Assembly and its member States, including to "[i]mplement their *erga omnes* obligations, ... as they relate to the prevention and prohibition of genocide, torture, racial segregation and apartheid, and refrain from aiding or abetting the commission of all violations of peremptory norms of international law."³
7. The Dossier is also pertinent following the decision of the Pre-Trial Chamber I of the International Criminal Court (ICC) on 21 November 2024 to issue warrants of arrest for Israel's Prime Minister Netanyahu and former Minister of Defence, Gallant.⁴ The Chamber found reasonable grounds to believe that "each bear criminal responsibility for the following crimes as co-perpetrators for committing the acts jointly with others: the war crime of starvation as a method of warfare; and the crimes against humanity of murder, persecution, and other inhumane acts".⁵
8. Significantly, "[t]he Chamber found that there are reasonable grounds to believe that the lack of food, water, electricity and fuel, and specific medical supplies, created conditions of life calculated to bring about the destruction of part of the civilian population in Gaza, which resulted in the death of civilians, including children due to malnutrition and dehydration".⁶
9. On 5 December 2024 Amnesty International produced a carefully reasoned and thoroughly researched report — based on evidence relating to Israel's actions, patterns of conduct and the dehumanising statements by Israeli officials — which concluded that there is sufficient evidence to believe that Israel has committed and continues to commit genocide in the Gaza Strip.⁷ The factual findings and legal analysis of Amnesty International's independent report, as well as its conclusions and recommendations, confirm and complement those contained in this Dossier in a number of important respects. In particular, the Amnesty International report concludes that the patterns of conduct that have characterised Israel's military operations, coupled with the statements of Israeli officials and soldiers made in the historical context of years of apartheid, an unlawful blockade and an unlawful occupation, provide sufficient evidence of Israel's intent to destroy Palestinians in Gaza.⁸
10. Following this introduction (Section I), the Dossier sets out:
 - Israel's failure to comply with the ICJ's Orders, and the situation in Gaza prior to the ceasefire (Section II)
 - Reports of patterns of conduct by Israel (Section III)
 - Statements of intent and incitement to genocide (Section IV)

² United Nations General Assembly ('UNGA'), *Report of the Special Committee to Investigate Israeli Practices Affecting the Human Rights of the Palestinian People and Other Arabs of the Occupied Territories*, A/79/363 (20 September 2024), <https://undocs.org/A/79/363>.

³ *Ibid.*, para. 71. See also, Section V below.

⁴ International Criminal Court, *Situation in the State of Palestine: ICC Pre-Trial Chamber I rejects the State of Israel's challenges to jurisdiction and issues warrants of arrest for Benjamin Netanyahu and Yoav Gallant* (21 November 2024), <https://www.icc-cpi.int/news/situation-state-palestine-icc-pre-trial-chamber-i-rejects-state-israels-challenges>

⁵ *Ibid.*

⁶ *Ibid.*

⁷ Amnesty International, *'You Feel Like You Are Subhuman': Israel's Genocide Against Palestinians in Gaza* (5 December 2024), <https://www.amnesty.org/en/documents/mde15/8668/2024/en/>.

⁸ Amnesty International correctly points out that, in terms of the international jurisprudence, including that of the ICJ: "[G]enocidal intent must be clear – its existence must be the only reasonable inference drawn from a pattern of conduct – but that does not mean it must be the only goal being pursued by the state. A state's actions can serve the dual goal of achieving a military result and destroying a group as such. Genocide can also be the means for achieving a military result". *Ibid.*, p. 105.

- Events in 2025 before and after the ceasefire (Section V)
- The requirement for urgent action by third states and the United Nations Security Council (Section VI)

11. This Dossier is accompanied by four Annexes, which collate the statements of intent and incitements by Israeli Government officials, military officers and soldiers and public figures.

II. REPORTS OF ISRAEL'S FAILURE TO COMPLY WITH THE COURT'S ORDERS, AND THE SITUATION IN GAZA PRIOR TO THE CEASEFIRE

Attacks, Displacement, Destruction

12. Between 4 October 2024 and 31 December 2024, 3,739 Palestinians were killed and 11,494 Palestinians injured in Gaza, bringing the toll since 7 October 2023 to 45,541 Palestinians killed and 108,338 Palestinians injured⁹ — 70 percent of whom are women and children.¹⁰ Seven per cent of the population in Gaza has been killed or injured.¹¹ By November 2024, Israel's intensified aggression on North Gaza had resulted in 17 incidents with ten or more Palestinians killed, including three incidents with eighty or more killed.¹² Al Jazeera journalists have been targeted by Israel as alleged "operatives in Hamas' military wing."¹³ In the three months since October 2024, at least 16 journalists were killed in continuing "extensive patterns" of attacks

⁹ United Nations Office for the Coordination of Humanitarian Affairs ('UN OCHA'), *Humanitarian Situation Update #226 | Gaza Strip* (4 October 2024), <https://www.ochaopt.org/content/humanitarian-situation-update-226-gaza-strip>; UN OCHA, *Reported impact snapshot | Gaza Strip* (31 December 2024), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-31-december-2024>.

¹⁰ The largest age group killed are children between five and nine years old. UN Office of the High Commissioner for Human Rights ('UN OHCHR'), *UPDATE REPORT Six-month update report on the human rights situation in Gaza: 1 November 2023 to 30 April 2024* (8 November 2024), <https://www.ohchr.org/sites/default/files/documents/countries/opt/20241106-Gaza-Update-Report-OPT.pdf>, pp. 6 and 8 (Noting that these are statistics which the UN OHCHR has reported as of 2 September 2024). At least 902 families have been completely erased across Gaza. Mohammed Haddad et al., "'Know their names': Palestinian families killed in Israeli attacks on Gaza", *Al Jazeera* (8 October 2024), <https://www.aljazeera.com/news/longform/2024/10/8/know-their-names-palestinian-families-killed-in-israeli-attacks-on-gaza>; Such is the magnitude of the killing it takes one hour to even scroll the names of the deceased: Al Jazeera English, @AJEnglish, Tweet (6:33 pm, 7 October 2024), <https://x.com/AJEnglish/status/1843328881501073482>.

¹¹ UN News, *'Hospitals have become battlegrounds': Gaza's health system on brink of collapse* (3 January 2025), <https://news.un.org/en/story/2025/01/1158741>.

¹² UN OHCHR, *Grave human rights and humanitarian situation in North Gaza amidst Israeli military strikes* (12 November 2024), <https://reliefweb.int/report/occupied-palestinian-territory/grave-human-rights-and-humanitarian-situation-north-gaza-amidst-israeli-military-strikes>.

¹³ Israel Defense Forces, @IDF, Tweet (4:01 pm, 23 October 2024), <https://x.com/IDF/status/1849088691450339461>.

on freedom of expression.¹⁴ Journalist Hassan Hamad was killed in an airstrike on Jabalya refugee camp,¹⁵ his remains reduced to a shoebox.¹⁶

13. Then Israeli Minister of Defence, Yoav Gallant, encouraged maximum harm, telling Israeli soldiers in Rafah on 30 October 2024 that it is “[y]our duty is to create military pressure, kill terrorists, harm them, take prisoners — everything that needs to be done.”¹⁷ The Israeli military continued its arbitrary arrests, detentions and enforced disappearances of Palestinian men and boys from Gaza,¹⁸ subjecting hundreds of men, including the elderly, to inhumane treatment — “stripped naked in the . . . rubble in Jabalya”¹⁹ — others photographed naked and hooded as trophy shots.²⁰ The “[m]istreatment of Palestinian detainees by Israeli authorities”, the United Nations Commission of Inquiry warns, “is the result of an intentional policy.”²¹
14. Israel continued its inducement of starvation.²² The Integrated Food Security Phase Classification (‘IPC’) warned in November 2024 that famine was imminent and

¹⁴ Journalists Saed Radwan, Hamza Youssef Abu Selmiya, and Haneen Mahmoud Baroud were killed in an Israeli attack on 27 October 2024, sports journalist Khaled Abu Zar in Jabalia was killed on 8 November, Ahmad and Zahra Abu Sakheil on 9 November, Mamdouh Qaneeta on 30 November, Iman Al Shanti, a reporter for Al Jazeera’s AJ+ platform, on 11 December, and Al-Mayadeen correspondent Mohammad Baalousha was killed on 14 December, as well as Mohammed Al Qrinawi. Al-Jazeera cameraman Ahmed Al-Louh was killed on 15 December, and five journalists from Al-Quds Today TV channel were killed on 26 December, Fadi Hassouna, Ibrahim Al-Sheikh Ali, Mohamed Al-Lidaa, Faisal Abu Al-Qumsan, Ayman Al-Jadi: Palestinian Centre for Human Rights – Palestinian Centre for Human Rights, @pchrgaza, Tweet (7:33 pm, 29 October 2024), <https://x.com/pchrgaza/status/1851316540517310828>; UN News, *Freedom of expression also under fire in Gaza war; rights expert says* (18 October 2024), <https://news.un.org/en/story/2024/10/1155881>; Quds News Network, @QudsNen, Tweet (3:50 pm, 8 November 2024), <https://x.com/QudsNen/status/1854899419528781837>; Hossam Shabat, @HossamShabat, Tweet (4:09 pm, 9 November 2024), <https://x.com/HossamShabat/status/1855251313652633956>; Hind Khoudary, @Hind_Gaza, Tweet (4:39 pm, 30 November 2024), https://x.com/Hind_Gaza/status/1862884132646244708; Al Mayadeen English, @MayadeenEnglish, Tweet (9:13 pm, 14 December 2024), <https://x.com/MayadeenEnglish/status/1868026645527109676>; UN Human Rights Palestine, @OHCHR_Palestine, Tweet (8:27 pm, 27 December 2024), https://x.com/OHCHR_Palestine/status/1872544834818363665; Committee to Protect Journalists (‘CPJ’), *Israeli forces kill at least 4 Gaza journalists in the past week* (16 December 2024), <https://cpj.org/2024/12/israeli-forces-kill-at-least-4-gaza-journalists-in-the-past-week/>; CPJ, *Israeli strike kills 5 Al-Quds Al-Yaum TV journalists in central Gaza* (26 December 2024), <https://cpj.org/2024/12/israeli-strike-kills-5-al-quds-al-yaum-tv-journalists-in-central-gaza/>.

¹⁵ UNESCO, *UNESCO Director-General condemns killing journalist Hassan Hamad in Palestine* (10 October 2024), <https://www.unesco.org/en/articles/unesco-director-general-condemns-killing-journalist-hassan-hamad-palestine>.

¹⁶ Anas Al-Sharif, @AnasAlSharif0, Tweet (7:25 am, 6 October 2024), <https://x.com/AnasAlSharif0/status/1842813537296499156>.

¹⁷ “Your duty is to create military pressure - this creates good conditions for a deal”, *HM News* (30 October 2024), <https://hm-news.co.il/514989/>; Bethan McKernan and William Christou, “Palestinians will not be allowed to return to homes in northern Gaza, says IDF”, *The Guardian* (6 November 2024), <https://www.theguardian.com/world/2024/nov/06/palestinians-will-not-be-allowed-to-return-to-homes-in-northern-gaza-says-idf>; Soldiers have been repositioned from Rafah to North Gaza, UN OHCHR, *UN Human Rights Office - OPT: The situation in North Gaza* (7 October 2024), <https://reliefweb.int/report/occupied-palestinian-territory/un-human-rights-office-opt-situation-north-gaza?>.

¹⁸ UN News, *Global Perspective Human Stories, ‘Entire population of north Gaza at risk of dying,’ warns UN’s top humanitarian official* (26 October 2024), <https://news.un.org/en/story/2024/10/1156171>; Hossam Shabat, @HossamShabat, Tweet (8:28 pm, 6 November 2024), <https://x.com/HossamShabat/status/1854229496401932557>; UN OHCHR, *UN Human Rights Office is concerned over the potential destruction of the Palestinian population in north Gaza* (20 October 2024), <https://reliefweb.int/report/occupied-palestinian-territory/un-human-rights-office-opt-un-human-rights-office-concerned-over-potential-destruction-palestinian-population-north-gaza>; UN OCHA, *Humanitarian Situation Update #239 | Gaza Strip* (19 November 2024), <https://www.ochaopt.org/content/humanitarian-situation-update-239-gaza-strip>.

¹⁹ UN Special Rapporteur on the right to housing, @adequatehousing, Tweet (6:12 am, 1 November 2024), <https://x.com/adequatehousing/status/1852201925971755136>; Reports have emerged of Israeli forces separating men and boys from women and children, and placing blindfolded men, hands bound, into a dug out pit, near the Indonesian Hospital in North Gaza: The Cradle, @TheCradleMedia, Tweet (8:23 pm, 19 October 2024), <https://x.com/TheCradleMedia/status/1847705177026896221>.

²⁰ Younis Tirawi, @ytirawi, Tweet (1:26 pm, 8 November 2024), <https://x.com/ytirawi/status/1854847909667225765>.

²¹ UNGA, *Report of the Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel*, A/79/232 (11 September 2024), para. 102, <https://documents.un.org/doc/undoc/gen/n24/262/79/pdf/n2426279.pdf>.

²² Hossam Shabat, @HossamShabat, Tweet (4:32 am, 30 October 2024), <https://x.com/HossamShabat/status/1851452023117660582>; UN News, *‘Looming catastrophe’: Experts warn of high risk of famine in northern Gaza* (8 November 2024), <https://news.un.org/en/story/2024/11/1156746>.

“[i]mmediate action” is required “within days.”²³ More than 1.8 million Palestinians are experiencing “extremely critical levels of hunger.”²⁴ Israel continues to outwardly flout the Court’s orders to provide humanitarian aid “at scale” — 43 per cent of humanitarian movements were denied in October 2024 — “the highest rate of access denial recorded” since October 2023.²⁵ The World Food Programme (‘WFP’) reported on 12 December 2024 that “[h]umanitarian aid has been blocked for over 65 days, leaving 65,000–75,000” Palestinians “without food, water, electricity, or healthcare” in North Gaza.²⁶ Hospitals had no food for their patients²⁷ — hunger is being “weaponized”.²⁸ Families are living on “water and salt only”²⁹ — “our children cry all day because of hunger”.³⁰ Municipalities warned that there was nothing to sustain life, and the United Nations warned that humanitarian “efforts to save lives are at breaking point”.³¹

15. Israel further exacerbated its forced displacement of thousands of Palestinians across Gaza to Al Mawasi — a sand dune with no infrastructure — “If al-Mawasi was a city, it would be the most densely populated city on the earth.”³² Fleeing mothers dragged heavy belongings and tired, barefoot toddlers; the disabled fleeing were carried by

²³ Integrated Food Security Phase Classification (‘IPC’), *IPC Famine Review Committee Alert, Gaza Strip* (8 November 2024), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_FRC_Alert_Gaza_Nov2024.pdf, p.1; Director-General of the World Health Organization, calling for “an immediate scale-up” of “food and medicines for severe malnutrition — within days”: Tedros Adhanom Ghebreyesus, @DrTedros, Tweet (12:12 am, 9 November 2024), <https://x.com/DrTedros/status/1855010569914335310>.

²⁴ UN News, *Global Perspective Human Stories, Over 1.8 million in Gaza face extreme hunger* (17 October 2024), <https://news.un.org/en/story/2024/10/1155836>.

²⁵ UN OCHA, *Humanitarian Situation Update #237 | Gaza Strip* (12 November 2024), <https://www.ochaopt.org/content/humanitarian-situation-update-237-gaza-strip?>.

²⁶ World Food Programme (‘WFP’), *WFP Palestine Emergency Response External Situation Report #41* (12 December 2024), <https://www.un.org/unispal/document/wfp-palestine-emergency-response-external-situation-report-41/>; World Food Programme, @WFP, Tweet (10:04 am, 25 October 2024), <https://x.com/WFP/status/1849723633037357404>.

²⁷ Eye on Palestine, @EyeonPalestine, Tweet (6:44 pm, 9 November 2024), <https://x.com/EyeonPalestine/status/1855290268594958673>; World Health Organization (‘WHO’), Dr. Rik Peeperkorn, *Representative for WHO occupied Palestinian territory remarks at the meeting of the United Nations Security Council on the situation of the health system in Gaza* (3 January 2025), <https://www.emro.who.int/opt/news/dr-rik-peeperkorn-representative-for-who-occupied-palestinian-territory-remarks-at-the-meeting-of-the-united-nations-security-council-on-the-situation-of-the-health-system-in-gaza-3-january-2.html>.

²⁸ Philippe Lazzarini, @UNLazzarini, Tweet (9:22 pm, 9 November 2024), <https://x.com/UNLazzarini/status/1855330245081211275>; UN News, *‘Dying hungry and in pain’: An increasingly likely outcome in Gaza* (19 December 2024), <https://news.un.org/en/story/2024/12/1158406>.

²⁹ Anas Al-Sharif @AnasAlSharif0, Tweet (12:47 am, 5 November 2024), <https://x.com/AnasAlSharif0/status/1853750948939628589>; Ben Reiff, “Israel’s true objective in northern Gaza? Removing Palestinians — and annexing the territory”, *The Guardian* (12 November 2024), <https://www.theguardian.com/commentisfree/2024/nov/12/israel-northern-gaza-palestinians-annexation-settlers>; Ahmed Dremly, “War on Gaza: Palestinians recount surviving Israel’s brutal Beit Lahia offensive”, *Middle East Eye* (14 December 2024), <https://www.middleeasteye.net/news/doomsday-palestinians-beit-lahia-survived-israel-offensive>.

³⁰ ICRC in Israel & OT, @ICRC_ilot, Tweet (1:57 pm, 23 October 2024), https://x.com/ICRC_ilot/status/1849057664975671584/photo/1.

³¹ “Northern Gaza’s Beit Lahia declared disaster area amid Israeli siege”, *Al Jazeera* (30 October 2024), <https://www.aljazeera.com/news/2024/10/30/northern-gazas-beit-lahiya-declared-disaster-area-amid-israeli-siege>; UN OCHA, *UN relief chief: “Our effort to save lives of survivors in Gaza is at breaking point”* (6 January 2025), <https://www.unocha.org/news/un-relief-chief-our-effort-save-lives-survivors-gaza-breaking-point>.

³² UN The Question of Palestine, *Gaza’s children: “Trapped in a cycle of pain” — UNICEF spokesperson* (18 October 2024), <https://www.un.org/unispal/document/unicef-press-release-18oct24/>; Al Mawasi “humanitarian zone”. Al Mawasi, comprising a mere 15 per cent of Gaza houses almost the entire population of the Gaza Strip (84 per cent of the Gaza Strip is under evacuation order). UN OHCHR, *UN Human Rights Office - OPT: The situation in North Gaza* (7 October 2024), <https://reliefweb.int/report/occupied-palestinian-territory/un-human-rights-office-opt-situation-north-gaza>; AvichayAdraee @AvichayAdraee, Tweet (12:09 pm, 26 October 2024), <https://x.com/AvichayAdraee/status/1850132629703585913>; AvichayAdraee, @AvichayAdraee, Tweet (11:08 am, 7 October 2024), <https://x.com/AvichayAdraee/status/1843232028302721501>; AvichayAdraee @AvichayAdraee, Tweet (8:49 am, 5 October 2024), <https://x.com/AvichayAdraee/status/1842472123413000417>; AvichayAdraee @AvichayAdraee, Tweet (12:06 pm, 31 December 2024), <https://x.com/AvichayAdraee/status/1874230679648780348>; AvichayAdraee @AvichayAdraee, Tweet (11:46 am, 3 January 2025), <https://x.com/AvichayAdraee/status/1875131558534799781>; UN News, *Gaza: ‘Every day without a ceasefire will bring more tragedy’* (2 January 2025), <https://news.un.org/en/story/2025/01/1158686>.

relatives.³³ Israeli drones shot at the fleeing displaced.³⁴ The displaced are living in “shanty towns”, in conditions described as “utterly desperate”, in tents “made of blankets.”³⁵ UN OCHA reported that it would “need four years to hand out tents to all who need them”, as Israel delayed the delivery of humanitarian aid.³⁶ Tents span as far as the eye can see, deep along the coastline, against the water’s edge.³⁷ Palestinians were being corralled into areas not fit “for humans to survive” — shelters holding 1,500 people have no bathrooms, sewage streams down the walls, waste and garbage is everywhere, with disease and “flies swarming.”³⁸ Palestinians are freezing to death in cold, wet tents in harsh winter conditions, seven babies have died from hypothermia since mid-December 2024.³⁹

16. Nowhere was safe in Gaza, “the basics of human survival are being destroyed”.⁴⁰ Displaced Palestinians sheltering in tents in Al-Aqsa Hospital in Deir Al Balah were targeted by airstrikes in “horrific” attacks and burnt alive screaming for help — their deaths recorded live.⁴¹ In escalating attacks, schools sheltering the displaced continued to be bombed, including 100 percent of schools in North Gaza which have

³³ Anas Al-Sharif, @AnasAlSharif0, Tweet (5:09 pm, 8 November 2024), <https://x.com/AnasAlSharif0/status/1854903985716559991>; “WATCH: The plight of disabled Palestinians in Gaza”, *Al Jazeera* (3 December 2024), <https://www.aljazeera.com/news/liveblog/2024/12/3/live-israeli-forces-kill-11-in-south-lebanon-order-new-gaza-displacement?update=3361642>.

³⁴ Abeer Salman et al., “Palestinians evacuating northern Gaza say they are being shot at by Israeli military”, *CNN World* (8 October 2024), <https://edition.cnn.com/2024/10/08/middleeast/gaza-jabalya-idf-shooting-intl/index.html>; Eye on Palestine, @EyeonPalestine, Tweet (9:37 pm, 26 October 2024), <https://x.com/EyeonPalestine/status/1850260605686702454>; Chantal Da Silva, “Children killed, men detained, families fleeing: Scenes of devastation in Israel’s assault on northern Gaza”, *NBC News* (23 October 2024), <https://www.nbcnews.com/news/world/harrowing-images-emerge-northern-gaza-un-warns-non-stop-israeli-strike-rcna176360>.

³⁵ United Nations Relief and Works Agency (‘UNRWA’), @UNRWA, Tweet (12:05 pm, 10 November 2024), <https://x.com/UNRWA/status/1855552310438457372>; MSF International, @MSF, Tweet (7:38 am, 2 January 2025), <https://x.com/MSF/status/1874721791295590729>.

³⁶ Nir Hasson and Sheren Falah Saab, “‘Siege Within a Siege’: Israel’s Army Blocks Aid to Tens of Thousands in Northern Gaza Strip”, *Haaretz* (6 November 2024), <https://www.haaretz.com/israel-news/2024-11-06/ty-article-magazine/.premium/siege-within-a-siege-israels-army-blocks-aid-to-tens-of-thousands-in-northern-gaza/00000192-fcfd-d51d-a5d3-fefd73e30000>; OCHA OPT (Palestine), @ochaopt, Tweet (10:04 pm, 29 December 2024), <https://x.com/ochaopt/status/1873490395700899997>.

³⁷ Louise Wateridge, @UNWateridge, Tweet (10:35 am, 5 October 2024), <https://x.com/UNWateridge/status/184248381197703452/photo/3>; UNITAR, *Flood impact and sea surge assessment in the coastal area of Khan Younis and Rafah, Gaza Strip* (Occupied Palestinian Territory) as of 01 Dec. 2024 (13 December 2024), <https://unosat.org/products/4050>; “Displaced Palestinians living in tents along central Gaza beach struggle to stay warm as winter hits”, *AP Archive* (1 January 2025), <https://www.youtube.com/watch?v=kefeo9seYsc>.

³⁸ UN Humanitarian, @UNOCHA, Tweet (4:16 pm, 6 November 2024), <https://x.com/UNOCHA/status/1854165955590410255>; UN News, Global Perspective Human Stories, *Intolerable conditions in northern Gaza ‘beyond imagination’* (5 November 2024), <https://news.un.org/en/story/2024/11/1156556>; Louise Wateridge, @UNWateridge, Tweet (8:21 pm, 5 November 2024), <https://x.com/UNWateridge/status/1853865228536054129>; UNRWA, @UNRWA, Tweet (5:30 pm, 7 November 2024), <https://x.com/UNRWA/status/1854546854555300303>.

³⁹ “Gaza babies dying from the cold as winter temperatures drop”, *BBC* (31 December 2024), <https://www.bbc.com/news/articles/cd0ep0j83p7o>; “WATCH: At least seven Palestinians die of hypothermia in Gaza as temperatures plummet”, *Al Jazeera* (31 December 2024), <https://aje.io/k5w6s6?update=3416110>; UN Special Rapporteur on the right to housing, @adequatehousing, Tweet (2:05 am, 29 December 2024), <https://x.com/adequatehousing/status/1873173445535776944>; UNRWA @UNRWA, Tweet (2:15 pm, 5 January 2025), <https://x.com/UNRWA/status/1875893763907936719>; UNRWA, @UNRWA, Tweet (7:00 am, 7 January 2025), <https://x.com/UNRWA/status/1876509074445226292>.

⁴⁰ UNICEF, @UNICEF, Tweet (12:22 am, 26 October 2024), <https://x.com/UNICEF/status/1849939539814469786>; OCHA OPT (Palestine), @ochaopt, Tweet (11:04 pm, 29 December 2024), <https://x.com/ochaopt/status/1873490395700899997>.

⁴¹ Drop Site, @DropSiteNews, Tweet (1:14 am, 14 October 2024), <https://x.com/dropsitenews/status/1845603995642978472>; Tedros Adhanom Ghebreyesus @DrTedros, Tweet (1:16 pm, 15 October 2024), <https://x.com/DrTedros/status/1846148034482081910>; MSF International, @MSF, Tweet (8:39 pm, 14 October 2024), <https://x.com/msf/status/1845897124917178612>. Another family was burnt to death in an attack on their tent in Zawaideh, north of Deir Al Balah: Younis Tirawi, @ytirawi, Tweet (12:50 am, 5 November 2024), <https://x.com/ytirawi/status/1853570461205979566>.

been “direct[ly] hit” or “damaged”.⁴² Between 4 October 2024 and 2 January 2025 at least 106 Palestinians were killed, including 29 children in Israeli airstrikes on tents and shelters for the displaced in Al Mawasi.⁴³ Many Palestinians were either unable to evacuate⁴⁴ or chose to not evacuate, including Mohammad Ibrahim — “I, along with my two sons, have stayed in Jabalya and will not go anywhere. There is no safe place in Gaza, and death is the same here or there.”⁴⁵ One doctor stated, “I never thought that international law or human-rights institutions would allow 2 million people to be locked in a cage and systematically massacred”.⁴⁶

17. Meanwhile Israel has completely destroyed Gaza. Rafah has been razed to the ground.⁴⁷ It is “destruction that defies belief, from Rafah, via Khan Yunis, to Gaza

⁴² Gaza Notifications, @gazanotice, Tweet (2:15 pm, 7 October 2024), <https://x.com/gazanotice/status/1854528004577255786>; UN OCHA, *Humanitarian Situation Update #229 | Gaza Strip* (15 October 2024), <https://www.ochaopt.org/content/humanitarian-situation-update-229-gaza-strip>; Anas Al-Sharif, @AnasAlSharif0, Tweet (12:41 am, 9 November 2024), <https://x.com/AnasAlSharif0/status/1855047909328216568>; “On 24 October, Ash Shuhada school in An Nuseirat refugee camp, in Deir al Balah, was hit and a fire reportedly broke out; according to the Government Media Office (GMO), 17 Palestinians were killed, including nine children, and over 52 others were injured” and “On 27 October, eleven Palestinians, including one girl and four women, were reportedly killed when Asma UNRWA school designated as IDP shelter in Ash Shati’ (Beach) refugee camp in Gaza city was hit.”: UN OCHA, *Humanitarian Situation Update #233 | Gaza Strip* (29 October 2024), <https://www.ochaopt.org/content/humanitarian-situation-update-233-gaza-strip>; Education Cluster, *Verification of damages to schools based on proximity to damaged sites - Gaza, Occupied Palestinian Territory, Update #7* (19 December 2024), <https://reliefweb.int/report/occupied-palestinian-territory/verification-damages-schools-based-proximity-damaged-sites-gaza-occupied-palestinian-territory-update-7-december-2024>, p. 12.

⁴³ UN OCHA, *Humanitarian Situation Update #226 | Gaza Strip* (4 October 2024), <https://www.ochaopt.org/content/humanitarian-situation-update-226-gaza-strip> (12 Palestinians killed, including one girl, and 26 injured in Al Mawasi on 11 October). See also, UN OCHA, *Humanitarian Situation Update #231 | Gaza Strip* (22 October 2024), <https://www.ochaopt.org/content/humanitarian-situation-update-231-gaza-strip> (5 killed and 15 injured in Al Mawasi on 14 October). See also, Ramy Abdu, @RamAbdu, Tweet (8:54 pm, 8 November 2024), <https://x.com/RamAbdu/status/1854975791874163078>; “Israeli strikes kill scores of Palestinians across Gaza”, *Middle East Eye* (9 November 2024), <https://www.middleeasteye.net/news/israeli-strikes-kill-scores-palestinians-across-gaza>. UN OCHA, *Humanitarian Situation Update #239 | Gaza Strip* (19 November 2024), <https://www.ochaopt.org/content/humanitarian-situation-update-239-gaza-strip> (11 Palestinians killed on 11 November 2024 in Al Mawasi, including 2 children and 7 Palestinians killed on 15 November in Al Mawasi); UN OCHA, *Humanitarian Situation Update #241 | Gaza Strip* (26 November 2024), <https://www.ochaopt.org/content/humanitarian-situation-update-241-gaza-strip> (18 killed including 7 children); UN OCHA, *Humanitarian Situation Update #245 | Gaza Strip* (10 December 2024), <https://www.ochaopt.org/content/humanitarian-situation-update-245-gaza-strip> (23 killed including 4 children and one pregnant woman); Medical Aid for Palestinians (‘MAP’), “Injuries I’ve never seen in my entire career” – Israeli military attack on UN-run school a “massacre” of civilians, reports MAP doctors (16 December 2024), <https://www.map.org.uk/news/archive/post/1676-ainjuries-iave-never-seen-in-my-entire-careera-a-israeli-military-attack-on-un-run-school-a-amassacre-of-civilians-reports-map-doctors> (18 killed including 12 children); UN News, *UN News Today 02 January 2025* (2 January 2025), <https://news.un.org/en/audio/2025/01/1158691> [02:13] (12 killed including 3 children); UNRWA, @UNRWA, Tweet (5:00 pm, 5 January 2025), <https://x.com/UNRWA/status/1875935288389951721>, “I’ve had a woman scream at me in absolute despair and horror because her son was killed in the strike in the so-called humanitarian zone. Her daughter was lying on the bed next to us, paralyzed”; Osama Abu Rabee, @dn_osama_rabee, Tweet (6:50 pm, 7 January 2025), https://x.com/dn_osama_rabee/status/1876687844204548561.

⁴⁴ “Furthermore, many elderly people have been unable to flee during the bombings or escape areas affected by the sudden and frequent evacuation orders issued by the Israeli military, primarily due to mobility issues; therefore, they have often remained stranded without sufficient support for basic needs, such as food, water or medical care.”: UN OCHA, *Humanitarian Situation Update #231 | Gaza Strip* (22 October 2024), <https://www.ochaopt.org/content/humanitarian-situation-update-231-gaza-strip>; UN OCHA, *Gaza Humanitarian Response Update | 8-21 December 2024* (24 December 2024), <https://www.ochaopt.org/content/gaza-humanitarian-response-update-8-21-december-2024>

⁴⁵ Abeer Salman et al., “Israeli military encircles northern Gaza refugee camp after saying it sees signs of Hamas regrouping”, *CNN World* (6 October 2024), <https://edition.cnn.com/2024/10/06/middleeast/israel-military-northern-gaza-hamas-intl/index.html>; “Israel, we will not leave our land in Gaza”, *New Arab* (18 December 2024), <https://www.newarab.com/opinion/israel-we-will-not-leave-our-land-gaza>.

⁴⁶ United Nations, Meetings Coverage and Press Releases, *Security Council Debates Israeli Attacks on Hospitals Allegedly Misused by Hamas, as UN Rights Chief Urges Independent Probes* (3 January 2025), <https://press.un.org/en/2025/sc15959.doc.htm>

⁴⁷ Ramy Abdu, @RamAbdu, Tweet (11:03 am, 8 November 2024), <https://x.com/RamAbdu/status/1854812058283323663>; UN OCHA, *Humanitarian Situation Update #251 | Gaza Strip* (31 December 2024), <https://www.ochaopt.org/content/humanitarian-situation-update-251-gaza-strip>; Bellingcat, *Satellite Imagery Shows Vast Destruction in Rafah* (23 August 2024), <https://www.bellingcat.com/news/2024/08/27/satellite-imagery-shows-vast-destruction-in-rafah/>.

City.”⁴⁸ Gaza city is in “ruins.”⁴⁹ It is not possible to tell “where the destruction starts or ends” — “homes, hospitals, schools, health clinics, mosques, apartments, restaurants — all completely flattened. An entire society now a graveyard.”⁵⁰ The UN OHCHR observed that, “it is difficult to conceive how such levels of civilian harm were justifiable, especially as such strikes not only killed individuals but also destroyed fundamental social structures and support networks of Palestinians in Gaza, raising inferences that the Israeli military also intended to weaken the overall cohesion of the Palestinian community in Gaza.”⁵¹

North Gaza

18. Between 6 October 2024 and the start of the ceasefire, Israel placed North Gaza under a crippling siege.⁵² Israel’s aggravated attack and total siege of North Gaza followed the widely publicised “Generals’ Plan” devised by retired General, Giora Eiland.⁵³ Israel applied a separate and worsened version of the Generals’ Plan. The situation in

⁴⁸ Jan Egeland, @NRC_Egeland, Tweet (4:50 pm, 6 November 2024), https://x.com/NRC_Egeland/status/1854174486934765693; UN News, *First Person: Gaza, where starving people are trapped in a land reduced to rubble* (6 January 2025), <https://news.un.org/en/story/2025/01/1158761>.

⁴⁹ Philippa Greer, @philippa_bear, Tweet (7:53 pm, 9 November 2024), https://x.com/philippa_bear/status/1855307798805876808; Philippa Greer @philippa_bear, Tweet (10:33 pm, 19 November 2024), https://x.com/philippa_bear/status/1858986967423177099; UN News, *Gaza: ‘Devastation is absolutely staggering’, says senior WFP official* (12 December 2024), <https://news.un.org/en/story/2024/12/1158106>.

⁵⁰ Louise Wateridge, @UNWateridge, Tweet (9:21 pm, 6 November 2024), <https://x.com/UNWateridge/status/1854242727480934704>; UN News, *Global Perspective Human Stories, Gaza is now a graveyard and there’s no escape, say UN aid teams* (20 December 2024), <https://news.un.org/en/story/2024/12/1158416>.

⁵¹ UN OHCHR, *UPDATE REPORT Six-month update report on the human rights situation in Gaza: 1 November 2023 to 30 April 2024* (8 November 2024), <https://www.ohchr.org/sites/default/files/documents/countries/countries/opt/20241106-Gaza-Update-Report-OPT.pdf>, p. 12; UNRWA, *UNRWA Situation Report #153 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-153-situation-gaza-strip-and-west-bank-including-east-jerusalem>.

⁵² For seventeen years Israel has controlled all the entry points, land, air and sea into Gaza. A second siege exists North of Wadi Gaza, including Gaza city and the refugee camps, and a third total siege is taking place in North Gaza, including in Beit Hanoun, Beit Lahiya and Jabalya. North Gaza being described as a “siege within a siege within a siege”, Nir Hasson and Sheren Falah Saab, “‘A Siege Within a Siege’: How Israel’s Army Blocks Aid to Tens of Thousands of Gazans”, *Haaretz* (6 November 2024), <https://www.haaretz.com/israel-news/2024-11-06/ty-article-magazine/.premium/siege-within-a-siege-israels-army-blocks-aid-to-tens-of-thousands-in-northern-gaza/00000192-fcfd-d51d-a5d3-fefd73e30000>; and <https://archive.fo/a3Arn>.

⁵³ Giora Eiland, “Opinion | In Defense of the ‘Generals’ Plan’: Laying Siege to Israel’s Enemy Isn’t a War Crime”, *Haaretz* (1 November 2024), <https://www.haaretz.com/opinion/2024-11-01/ty-article-opinion/.premium/in-defense-of-the-generals-plan-laying-siege-to-israels-enemy-isnt-a-war-crime/00000192-e406-d2fe-affe-e76f2f410000>, also available at <https://archive.fo/zE7EO#selection-529.0-533.84>. General Eiland has previously acted in an informal advisory group to the Minister of Defence, and has openly encouraged genocidal attacks against Palestinians in Gaza. Eiland reportedly “proposed” this plan to the Israeli army ten months ago, *Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (South Africa v. Israel), Application instituting proceedings and request for the indication of provisional measures of 29 December 2023*, <https://www.icj-cij.org/sites/default/files/case-related/192/192-20231228-app-01-00-en.pdf> (*‘South Africa v. Israel, Application’*), pp. 62-64; General Eiland’s plan is a blue print for genocide: of mass evacuations, siege and starvation.” The first phase is to let all the people who already live there [in North Gaza] know, that they should leave this area and they should evacuate . . . Then after the people leave . . . all this area by definition is going to be a military zone, because only the combatants of Hamas will stay there. And then we can tell those people who stay there, especially those combatants that they have two choices, either to surrender and if not, we will stop to enable supply to enter this region. And when I am speaking about supplies, I am speaking about everything: food, fuel, water . . . And if they cannot be there, either because they manage to flee with the people, with the civilians, which is fine, or they surrender, or if they stay they will die of starvation, then we will easily be able to take this land, without the need to fight in so many, a very populated area . . . we will simply be able to take this land”, The Jewish Institute for National Security of America (‘JINSA’), *Watch Webinar – The ‘Generals’ Plan’ for Gaza* (21 October 2024), <https://jinsa.org/the-generals-plan-for-gaza/> [at 15:24]; Eiland explains further “[h]ad Hamas understood that not returning hostages means losing 35 percent of the Strip’s territory, it would have compromised long ago”, Giora Eiland, “Opinion | In Defense of the ‘Generals’ Plan’: Laying Siege to Israel’s Enemy Isn’t a War Crime”, *Haaretz* (1 November 2024), <https://www.haaretz.com/opinion/2024-11-01/ty-article-opinion/.premium/in-defense-of-the-generals-plan-laying-siege-to-israels-enemy-isnt-a-war-crime/00000192-e406-d2fe-affe-e76f2f410000>, also available at <https://archive.fo/zE7EO#selection-529.0-533.84>.

North Gaza was described as “catastrophic”,⁵⁴ and “apocalyptic.”⁵⁵ Instead of waiting for the full evacuation of all Palestinians before carrying out (the already genocidal plan) of forced starvation of all remaining Palestinians in the territory, Israel escalated an aggressive bombing campaign on North Gaza, placing it under full siege, while Palestinians remained either trapped in their homes, or attempted to flee.⁵⁶

19. Israel’s sustained and concerted siege and military assault on North Gaza⁵⁷ was marked by relentless indiscriminate attacks on residential properties in densely populated residential neighbourhoods housing young families, with mass civilian casualties.⁵⁸ The Israeli military cut off food, and humanitarian aid,⁵⁹ attacked aid convoys,⁶⁰ targeted and attacked hospitals,⁶¹ attacked rescue teams and medics,⁶² including those attending to the injured in double tap strikes.⁶³ Israel ordered the forced displacement of the entire remaining population of North Gaza,⁶⁴ including 9,175 pregnant women.⁶⁵ At the same time, the Israeli military attacked fleeing displaced Palestinians,⁶⁶ arrested and disappeared Palestinian men and boys, including patients from ambulances, and

⁵⁴ Tedros Adhanom Ghebreyesus, @DrTedros, Tweet (4:37 pm, 26 October 2024), <https://x.com/DrTedros/status/1850185021400691126>.

⁵⁵ Tedros Adhanom Ghebreyesus, @DrTedros, Tweet (8:33 pm, 1 November 2024), <https://x.com/DrTedros/status/1852418682661622089>; Yaniv Kubovich, “Israeli Defense Officials: Gov’t Pushing Aside Hostage Deal, Eyeing Gaza Annexation”, *Haaretz* (13 October 2024), <https://www.haaretz.com/israel-news/2024-10-13/ty-article/.premium/israeli-defense-officials-govt-pushing-aside-hostage-deal-eyeing-gaza-annexation/00000192-8585-d988-a3ba-dde59a470000>.

⁵⁶ Medecins Sans Frontieres, *Palestinians in northern Gaza are in desperate need of aid* (7 November 2024), <https://www.doctorswithoutborders.org/latest/palestinians-northern-gaza-are-desperate-need-aid>.

⁵⁷ UN OHCHR, *UN Human Rights Office - OPT: The situation in North Gaza* (7 October 2024), https://reliefweb.int/report/occupied-palestinian-territory/un-human-rights-office-opt-situation-north-gaza?utm_source=rw-subscriptions&utm_medium=email&utm_campaign=country_updates_180; UN News, Global Perspective Human Stories, *Gaza: No let-up in Israeli military offensive, situation ‘only getting worse’* (28 October 2024), <https://news.un.org/en/story/2024/10/1156191>.

⁵⁸ UN OCHA, *Humanitarian Situation Update #233 | Gaza Strip* (29 October 2024), <https://www.ochaopt.org/content/humanitarian-situation-update-233-gaza-strip>; Younis Tirawi @ytirawi, Tweet (8:29 am, 29 October 2024), <https://x.com/ytirawi/status/1851179601390670299>.

⁵⁹ UN News, Global Perspective Human Stories, *Security Council meets on north Gaza as ‘supplies for survival’ run out* (16 October 2024), <https://news.un.org/en/story/2024/10/1155776>; OCHA OPT (Palestine)@ochaopt, Tweet (12:48 am, 31 December 2024), <https://x.com/ochaopt/status/1874059992736948352>.

⁶⁰ Philippe Lazzarini @UNLazzarini, Tweet (7:49 pm, 6 January 2025), <https://x.com/UNLazzarini/status/1876340260646609040>.

⁶¹ Tedros Adhanom Ghebreyesus, @DrTedros, Tweet (6:02 am, 30 December 2024), <https://x.com/DrTedros/status/1873595575167283556>; UN News, *Israel attacks push Gaza healthcare ‘to brink of collapse’* (31 December 2024), <https://news.un.org/en/story/2024/12/1158646>.

⁶² United Nations International Children’s Emergency Fund (‘UNICEF’), *Stop the assault on Palestinians in Gaza and on those trying to help them* (1 November 2024), <https://www.unicef.org/press-releases/stop-assault-palestinians-gaza-and-those-trying-help-them>;

⁶³ Evan Hill, “Video shows Israeli strike on crowd of people trying to help wounded boy”, *The Washington Post* (21 October 2024), <https://www.washingtonpost.com/world/2024/10/21/gaza-israel-strike-jabalya-video/?>.

⁶⁴ Avichay Adraee, @AvichayAdraee, Tweet (6:59 am, 6 October 2024), <https://x.com/AvichayAdraee/status/1842791821409149136>; Avichay Adraee, @AvichayAdraee, Tweet (11:02 am, 7 October 2024), <https://x.com/AvichayAdraee/status/1843215402358178136>, including Beit Hanoun, Jabalia, Beit Lahia; Avichay Adraee, @AvichayAdraee, Tweet (3:39 pm, 8 October 2024), <https://x.com/AvichayAdraee/status/1843647422829879299>, for the Jabalia area; Avichay Adraee, @AvichayAdraee, Tweet (7:00 am, 12 October 2024), <https://x.com/AvichayAdraee/status/1844966449091100695>; Avichay Adraee, @AvichayAdraee, Tweet (10:03 pm, 13 December 2024), <https://x.com/AvichayAdraee/status/1867676808331899333>, the area southeast of Jabalia; Avichay Adraee, @AvichayAdraee, Tweet (3:54 pm, 28 December 2024), <https://x.com/AvichayAdraee/status/1873019816950260170>, Beit Hanoun area; Avichay Adraee, @AvichayAdraee, Tweet (4:23 pm, 29 December 2024), <https://x.com/AvichayAdraee/status/1873389368125046808>, for Al-Awda City and Al-Murabitoun neighborhood in North Gaza governorate, and Al-Nasr in the Gaza governorate; Avichay Adraee, @AvichayAdraee, Tweet (4:39 pm, 1 January 2025), <https://x.com/AvichayAdraee/status/1874480682493489272>, Jabalia area; Avichay Adraee, @AvichayAdraee, Tweet (2:33 pm, 21 October 2024), <https://x.com/AvichayAdraee/status/1848341825364627660/video/3>; Jan Egeland, @NRC_Egeland, Tweet (7:20 pm, 8 November 2024), https://x.com/NRC_Egeland/status/1854937155900260814.

⁶⁵ UNFPA, @UNFPA, Tweet (10:38 pm, 11 October 2024), <https://x.com/UNFPA/status/1844839922881982900>.

⁶⁶ UN OHCHR, *UN Human Rights Office - OPT: UN Human Rights Office is concerned over the potential destruction of the Palestinian population in north Gaza* (20 October 2024), <https://reliefweb.int/report/occupied-palestinian-territory/un-human-rights-office-opt-un-human-rights-office-concerned-over-potential-destruction-palestinian-population-north-gaza?>.

medical doctors — at least three men in detention from North Gaza died.⁶⁷ Meanwhile, the Israeli military razed and burned properties to the ground,⁶⁸ while promising that there would be no return of Palestinians to North Gaza,⁶⁹ that the territory of Gaza for Palestinians would be reduced in size.⁷⁰

20. The Israeli military carried out relentless attacks on hospitals across North Gaza, killing Palestinians carrying white flags,⁷¹ arresting and disappearing hospital staff,⁷² including the director of Kamal Adwan Hospital Dr Hussam Sufiya, who was reportedly being held in the notorious Sde Teiman torture centre⁷³; alongside ordering the evacuation of patients, medical staff and the displaced sheltering in hospitals.⁷⁴ Israel prevented the delivery of medical aid and humanitarian supplies into North Gaza — the little aid that was permitted had then been targeted and shelled.⁷⁵ Communities were “being punished for receiving aid”.⁷⁶ Around 10,000 children

⁶⁷ UN OCHA, *Humanitarian Situation Update #251 | Gaza Strip* (31 December 2024), <https://www.ochaopt.org/content/humanitarian-situation-update-251-gaza-strip>; UN OHCHR, *UN experts horrified at blatant disregard for health rights in Gaza following deadly raid on Kamal Adwan hospital* (2 January 2025), <https://www.ohchr.org/en/press-releases/2025/01/un-experts-horrified-blatant-disregard-health-rights-gaza-following-deadly>.

⁶⁸ Younis Tirawi, @ytirawi, Tweet (1:43 pm, 31 October 2024), <https://x.com/ytirawi/status/1851953115081089073>; Younis Tirawi, @ytirawi, Tweet (9:14 pm, 21 October 2024), <https://x.com/ytirawi/status/1848442788620234971>; Younis Tirawi, @ytirawi, Tweet (12:58 pm, 8 November 2024), <https://x.com/ytirawi/status/1854840901580861451>; Younis Tirawi, @ytirawi, Tweet (7:39 pm, 2 November 2024), <https://x.com/ytirawi/status/1852767606677086261>; B.M., @ireallyhateyou, Tweet (9:50 pm, 1 November 2024), <https://x.com/ireallyhateyou/status/1852438020605235301>.

⁶⁹ Bethan McKernan and William Christou, “Palestinians will not be allowed to return to homes in northern Gaza, says IDF”, *The Guardian* (6 November 2024), <https://www.theguardian.com/world/2024/nov/06/palestinians-will-not-be-allowed-to-return-to-homes-in-northern-gaza-says-idf>; see also, e.g., “I hope that Jewish settlement will begin in most of the Katif region and what was formerly the city of Gaza, that the Gazans will be concentrated in a very defined area and will live as refugees their entire lives without water and electricity until they voluntarily decide to emigrate”: Younis Tirawi, @ytirawi, Tweet (9:52 am, 31 October 2024), <https://x.com/ytirawi/status/1851894981172121858>.

⁷⁰ Giora Eiland, “Opinion | In Defense of the ‘Generals’ Plan’: Laying Siege to Israel’s Enemy Isn’t a War Crime”, *Haaretz* (1 November 2024), <https://www.haaretz.com/opinion/2024-11-01/ty-article-opinion/.premium/in-defense-of-the-generals-plan-laying-siege-to-israels-enemy-isnt-a-war-crime/00000192-e406-d2fe-affe-e76f2f410000>, also available at <https://archive.fo/zE7EO#selection-529.0-533.84>. This echoes the promise of Foreign Minister Eli Cohen in an Army Radio broadcast in October 2023: Jacob Magid, “Foreign minister: At war’s end, not only will Hamas be gone, but Gaza’s territory will shrink” *The Times of Israel* (18 October 2023), https://www.timesofisrael.com/liveblog_entry/foreign-minister-at-wars-end-not-only-will-hamas-be-gone-but-gazas-territory-will-shrink/; Similarly, Minister Gideon Sa’ar, a member of the Security Cabinet, stated, “Gaza must be smaller by the end of the war . . . [b]oth in the east and in the north. And they must lose this territory”: “Israeli minister on Gaza: ‘Losing land is price Arabs understand’”, *Al Jazeera* (17 October 2023), <https://www.aljazeera.com/program/newsfeed/2023/10/17/israeli-minister-losing-land-is-price-arabs>; See also, then Minister of Foreign Affairs, Israel Katz, who is the current Minister of Defence, stating “[We] will have to take buffer zones. Personally, I’m in favour of taking the northern border area, where Dugit, Nisanit, and Elei Sinai used to be, and the fence was behind them”: Efrat Karo, “Minister Katz: ‘We Are Going All-Out – Destroy Hamas’”, *Now 14* (22 October 2023), <https://www.now14.co.il/article/862020>.

⁷¹ UN OHCHR, *UN experts horrified at blatant disregard for health rights in Gaza following deadly raid on Kamal Adwan hospital* (2 January 2025), <https://www.ohchr.org/en/press-releases/2025/01/un-experts-horrified-blatant-disregard-health-rights-gaza-following-deadly>.

⁷² UN OCHA, *Acting UN relief chief: ‘Disregard for humanity must stop’ in North Gaza* (26 October 2024), <https://www.ochaopt.org/content/acting-un-relief-chief-disregard-humanity-must-stop-north-gaza>; IASC, *Statement by Principals of the Inter-Agency Standing Committee - Stop the assault on Palestinians in Gaza and on those trying to help them* (1 November 2024), <https://interagencystandingcommittee.org/inter-agency-standing-committee/statement-principals-inter-agency-standing-committee-stop-assault-palestinians-gaza-and-those-trying>; UN OHCHR, *West Bank raids, detention and ill-treatment of Palestinians* (11 November 2024), <https://reliefweb.int/report/occupied-palestinian-territory/un-human-rights-office-opt-west-bank-raids-detention-and-ill-treatment-palestinians>.

⁷³ “Gaza hospital chief held at Israel’s notorious Sde Teiman prison, released detainees say”, *Middle East Eye* (30 December 2024), <https://www.middleeasteye.net/news/gaza-war-kamal-adwan-hospital-chief-held-israel-sde-teiman-prison>.

⁷⁴ UN News, *Gaza: Hospitals closed, aid denied, civilians trapped* (30 December 2024), <https://news.un.org/en/story/2024/12/1158631>.

⁷⁵ Oxfam, *Just twelve aid trucks of food and water into the North Gaza Governorate in 2.5 months* (22 December 2024), <https://www.oxfam.org/en/press-releases/just-twelve-aid-trucks-food-and-water-north-gaza-governorate-25-months>.

⁷⁶ UN OCHA, *Humanitarian Situation Update #237 | Gaza Strip* (12 November 2024), <https://www.ochaopt.org/content/humanitarian-situation-update-237-gaza-strip>; PALESTINE ONLINE, @OnlinePalEng, Tweet (10:41 am, 15 November 2024), <https://x.com/OnlinePalEng/status/1857358339061002368>; UN Humanitarian, @UNOCHA, Tweet (1:13 pm, 21 November 2024), <https://x.com/UNOCHA/status/1859585914185367830>; AJ+, @ajplus, Tweet (4:23 am, 31 October 2024), <https://x.com/ajplus/status/1851812083526177138>.

were unable to access the Polio vaccine.⁷⁷ Al Awda Hospital was “without many essential medicines for more than 85 days”.⁷⁸ Israel brought the “healthcare system to the brink of total collapse”, and hospitals became a “death trap”.⁷⁹

21. Israel continued to characterise North Gaza as “a dangerous combat zone”⁸⁰ where Israel would operate “with force.”⁸¹ Soldiers preparing to enter Jabalya were filmed singing extremist revenge songs, singing “[a]nd I will take the revenge of one of my two eyes of the Philistines. May their name be erased!”,⁸² while compilations of the Israeli military bulldozing homes in Jabaliya were approvingly circulated by Israeli journalists.⁸³ In October 2024, the Israeli military encircled and attacked Jabalya refugee camp, leaving residents “stranded in their homes amid increased bombardment and fighting.”⁸⁴ Israel carried out “a deadly series of mass casualty incidents”⁸⁵ — killing entire families⁸⁶ — over 50 children were killed over two days in Jabalya.⁸⁷ In Beit Lahiya hundreds more were killed, including 25 children in a “horrific strike” on 29 October 2024,⁸⁸ and a further 75 women and children killed in

⁷⁷ Many children held under siege in North Gaza will not get the polio vaccine to prevent the paralyzing disease — “7000-10,000 children in inaccessible areas like Jabalia, Beit Lahiya and Beit Hanoun remain unvaccinated and vulnerable to the poliovirus” — increasing the risk of further spread to neighbouring countries: WHO, *Second round of polio campaign in Gaza completed amid ongoing conflict and attacks: UNICEF and WHO* (6 November 2024), <https://www.who.int/news/item/06-11-2024-second-round-of-polio-campaign-in-gaza-completed-amid-ongoing-conflict-and-attacks--unicef-and-who>; James Elder, @1james_elder, Tweet (10:23 am, 23 October 2024), https://x.com/1james_elder/status/1849003698296377533.

⁷⁸ WHO, Dr. Rik Peepkorn, Representative for WHO occupied Palestinian territory remarks at the meeting of the United Nations Security Council on the situation of the health system in Gaza (3 January 2025), <https://www.emro.who.int/opt/news/dr-rik-peepkorn-representative-for-who-occupied-palestinian-territory-remarks-at-the-meeting-of-the-united-nations-security-council-on-the-situation-of-the-health-system-in-gaza-3-january-2.html>.

⁷⁹ United Nations, Palestine, *Pattern of Israeli attacks on Gaza hospitals raises grave concerns about serious crimes under international law – UN report* (2 January 2025), <https://palestine.un.org/en/286847-pattern-israeli-attacks-gaza-hospitals-raises-grave-concerns-about-serious-crimes-under>.

⁸⁰ Avichay Adraee, @AvichayAdraee, Tweet (5:59 am, 6 October 2024), <https://x.com/AvichayAdraee/status/1842791821409149136>.

⁸¹ Avichay Adraee, @AvichayAdraee, Tweet (2:39 pm, 8 October 2024), <https://x.com/AvichayAdraee/status/1843647422829879299>.

⁸² YINONEWS [Yinon Magal News], @yinonews, Telegram (13 November 2024), <https://t.me/yinonews/28149>; see also, Nimer Sultany, @NimerSultany, Tweet (11:10 am, 14 November 2024), <https://x.com/NimerSultany/status/1856988017799446607>.

⁸³ YINONEWS [Yinon Magal News], @yinonews, Telegram (11 November 2024), <https://t.me/yinonews/28020>; also available at B.M., @ireallyhateyou, Tweet (9:44 pm, 11 November 2024), <https://x.com/ireallyhateyou/status/1856060522673877362>; Hallel Bitton Rosen, @BittonRosen, Tweet (10:43 am, 23 October 2024), <https://x.com/BittonRosen/status/1849008804567920727>.

⁸⁴ UN OCHA, *Civilians in northern Gaza cut off from supplies and services critical for survival* (13 October 2024), <https://www.ochaopt.org/content/civilians-northern-gaza-cut-supplies-and-services-critical-survival>.

⁸⁵ United Nations Special Coordinator for the Middle East Peace Process (‘UNSCO’), *Statement by UN Special Coordinator for the Middle East Peace Process, Tor Wennesland, on Beit Lahia - Northern Gaza* (29 October 2024), https://unsco.unmissions.org/sites/default/files/sc_statement_on_gaza_-_29_october_2024.pdf; UN OHCHR, *UN Human Rights Office - OPT: UN Human Rights Office is concerned over the potential destruction of the Palestinian population in north Gaza* (20 October 2024), <https://reliefweb.int/report/occupied-palestinian-territory/un-human-rights-office-opt-un-human-rights-office-concerned-over-potential-destruction-palestinian-population-north-gaza>; [87 Palestinians killed]; UN OCHA, *Humanitarian Situation Update #235 | Gaza Strip* (5 November 2024), <https://www.ochaopt.org/content/humanitarian-situation-update-235-gaza-strip> [42 Palestinians killed]; Nidal al-Mughrabi, “Israeli strike kills dozens in north Gaza residential block, US calls incident ‘horrific’”, *SWI* (30 October 2024), <https://www.swissinfo.ch/eng/israeli-strike-kills-dozens-in-north-gaza-residential-block%2c-us-calls-incident-%27horrific%27/87866018> [93 Palestinians killed].

⁸⁶ “Israel bombards Jabalia refugee camp for second straight day”, *Al Jazeera* (1 November 2023), <https://www.aljazeera.com/news/2023/11/1/israel-bombs-jabalia-refugee-camp-for-second-day-palestinian-officials-say> [at least 50 Palestinians killed]; UN OCHA, *Humanitarian Situation Update #229 | Gaza Strip* (15 October 2024), <https://www.ochaopt.org/content/humanitarian-situation-update-229-gaza-strip> [63 Palestinians killed in Jabalya]; UN OCHA, *Humanitarian Situation Update #233 | Gaza Strip* (29 October 2024), <https://www.ochaopt.org/content/humanitarian-situation-update-233-gaza-strip> [at least 156 Palestinians killed in Jabalya].

⁸⁷ UNICEF, *Statement by UNICEF Executive Director Catherine Russell on a deadly weekend of attacks in North Gaza* (2 November 2024), <https://www.unicef.org/press-releases/statement-unicef-executive-director-catherine-russell-deadly-weekend-attacks-north>. This contributing to the 13,319 identified children killed in Gaza since 7 October 2023, UN OCHA, *Reported impact snapshot | Gaza Strip* (5 November 2024), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-5-november-2024>.

⁸⁸ Tor Wennesland, @TWennesland, Tweet (11:50 pm, 29 October 2024), <https://x.com/TWennesland/status/1851381208560591109/photo/1>; Younis Tirawi, @ytirawi, Tweet (8:29 am, 29 October 2024), <https://x.com/ytirawi/status/1851179601390670299>.

two strikes on 28 November 2024.⁸⁹ The tower blocks of Beit Hanoun were reduced to “dust”.⁹⁰ The injured were left to die, buried alive under the rubble as Israel denied coordination requests — “bodies remain scattered in the streets”⁹¹ — “[t]he smell of death is everywhere”;⁹² a “dystopian horror.”⁹³ It is such Israeli conduct that risks recurring in aggravated fashion should the ceasefire break.

United Nations Relief and Works Agency (‘UNRWA’)

22. On 28 October 2024, Israel’s Knesset passed legislation targeting and closing UNRWA — the backbone of the humanitarian aid in Gaza.⁹⁴ The legislation which would take ninety days to take effect “prohibit[s] UNRWA operations within what is referred to as the sovereign territory of the State of Israel”⁹⁵ — shuttering UNRWA’s work in Palestine. A second bill was passed requiring that “Authorities of the state, including entities and individuals holding public positions by law, shall not maintain any contact with UNRWA or with its representatives.”⁹⁶ The legislation “in effect denies the protections and means essential for UNRWA to operate” and “risk[s] the collapse of UNRWA’s operations” in the entire occupied Palestinian territory.⁹⁷ The Mayor of Jerusalem organised a convening celebrating the closure of UNRWA, the “Nazi enemy.”⁹⁸ Without UNRWA, “civilians in Gaza will lose their last remaining access to food, water, and medicine.”⁹⁹ UNICEF warned that a “decision such as this suddenly means that a new way has been found to kill children”¹⁰⁰ — “more people will die.”¹⁰¹ The attack on UNRWA has been condemned as “an affront to international law”,¹⁰² that banning UNRWA will “increase the risk of disease outbreaks”, there is “simply no alternative.”¹⁰³

⁸⁹ UN OCHA, *Humanitarian Situation Update #243 | Gaza Strip* (3 December 2024), <https://www.ochaopt.org/content/humanitarian-situation-update-243-gaza-strip>.

⁹⁰ Younis Tirawi, @ytirawi, Tweet (1:14 pm, 6 January 2025), <https://x.com/ytirawi/status/1876240832438677528>.

⁹¹ UN OCHA, *Humanitarian Situation Update #231 | Gaza Strip* (22 October 2024), <https://www.ochaopt.org/content/humanitarian-situation-update-231-gaza-strip>.

⁹² Philippe Lazzarini, @UNLazzarini, Tweet (9:54 am, 22 October 2024), <https://x.com/UNLazzarini/status/1848634094730809815>.

⁹³ UN News, @UN_News_Centre, Tweet (5:23 pm, 6 November 2024), https://x.com/UN_News_Centre/status/1854182849894658543.

⁹⁴ UNRWA, *‘More people will die’: How Israel’s UNRWA ban affects Palestinians in Gaza and beyond* (10 November 2024), <https://www.unrwa.org/newsroom/official-statements/%E2%80%98more-people-will-die%E2%80%99-how-israel%E2%80%99s-unrwa-ban-affects-palestinians-gaza-and-beyond>.

⁹⁵ UNRWA, *Letter from UNRWA Commissioner General Philippe Lazzarini to the President of the United Nations General Assembly Mr Philémon Yang* (29 October 2024), <https://www.unrwa.org/newsroom/official-statements/letter-unrwa-cg-philippe-lazzarini-president-ga-philemon-yang>.

⁹⁶ Bill for the Cessation of UNRWA Activities, 5784–2024, [unofficial translation by Adalah], https://www.adalah.org/uploads/uploads/UNRWA_bills_translation_October_2024.pdf.

⁹⁷ UNRWA, *Letter from UNRWA Commissioner General Philippe Lazzarini to the President of the United Nations General Assembly Mr Philémon Yang* (29 October 2024), <https://www.unrwa.org/newsroom/official-statements/letter-unrwa-cg-philippe-lazzarini-president-ga-philemon-yang>.

⁹⁸ Arie King, @arieh_king, Tweet (5:17 pm, 10 October 2024), https://x.com/arieh_king/status/1844396830190338338.

⁹⁹ European External Action Service, *The future of UNRWA is a test of our humanity* (1 November 2024), https://www.eeas.europa.eu/eeas/future-unrwa-test-our-humanity_en.

¹⁰⁰ United Nations Geneva, @UNGeneva, Tweet (1:00 pm, 2 November 2024), <https://x.com/UNGeneva/status/1852667182322171916>.

¹⁰¹ UNRWA, *‘More people will die’: How Israel’s UNRWA ban affects Palestinians in Gaza and beyond* (10 November 2024), <https://www.unrwa.org/newsroom/official-statements/%E2%80%98more-people-will-die%E2%80%99-how-israel%E2%80%99s-unrwa-ban-affects-palestinians-gaza-and-beyond>.

¹⁰² Rami Ayari, @Raminho, Tweet (5:24 pm, 6 November 2024), <https://x.com/Raminho/status/1854182955427430498>.

¹⁰³ Tedros Adhanom Ghebreyesus, @DrTedros, Tweet (7:33 pm, 4 November 2024), <https://x.com/DrTedros/status/1853490814691012703>.

The Response by Third States and International Organisations

23. In addition to the Report of the United Nations Special Committee to Investigate Israeli Practices Affecting the Human Rights of the Palestinian People and Other Arabs of the Occupied Territories, which concludes “that the policies and practices of Israel during the reporting period are consistent with the characteristics of genocide”,¹⁰⁴ member States have increasingly condemned Israel’s genocidal conduct in Gaza. Since October 2024, over 50 States have called on the United Nations Security Council, the United Nations General Assembly and the United Nations Secretary General to implement an arms embargo against Israel.¹⁰⁵ Australia has withdrawn defence export permits to Israel.¹⁰⁶ Dáil Éireann, the Irish parliament passed a motion recognising “that genocide is being perpetrated before our eyes by Israel in Gaza.”¹⁰⁷ Malaysia is seeking Israel’s expulsion from the United Nations.¹⁰⁸
24. United Nations Secretary-General, António Guterres, warned that Israel’s operations in North Gaza, “are making the conditions of life untenable for the Palestinian population there.”¹⁰⁹ The United Nations Human Rights Office echoed that Israel’s hostilities in North Gaza “may be causing the destruction of the Palestinian population in Gaza’s northernmost governorate through death and displacement. This is particularly the case around Jabalya, Beit Lahiya and Beit Hanoun.”¹¹⁰
25. United Nations High Commissioner for Human Rights, Volker Türk, announced on 28 October 2024 that “[t]oday, one of the darkest moments of the Gaza conflict is unfolding in the north of the Strip. As we speak, the Israeli military is subjecting an entire population to bombing, siege and starvation, as well as being forced to choose between mass displacement and being trapped in an active conflict zone”¹¹¹ — “[e]ither the world ashamedly fails those who so desperately need help, or we stand united and put a stop to this”¹¹² — “We are facing what could amount to atrocity crimes.”¹¹³ The “reality of intense hostilities” is “tearing lives apart.”¹¹⁴ The international community has been put on notice, “[t]he entire population of North Gaza is at risk of dying”,¹¹⁵ and again by 15 United Nations and international aid agencies, that the “entire Palestinian population in North Gaza [wa]s at imminent risk

¹⁰⁴ UNGA, *Report of the Special Committee to Investigate Israeli Practices Affecting the Human Rights of the Palestinian People and Other Arabs of the Occupied Territories*, A/79/363 (20 September 2024), <https://undocs.org/A/79/363>, para. 69.

¹⁰⁵ Progressive International, @ProgIntl, Tweet (4:00 pm, 4 November 2024), <https://x.com/ProgIntl/status/1853437192988709288>.

¹⁰⁶ “Government ‘lapses’ some defence export permits to Israel”, *AU Manufacturing* (8 November 2024), <https://www.aumanufacturing.com.au/government-cancels-some-defence-export-permits-to-israel>.

¹⁰⁷ Cillian Sherlock, PA, “Dáil passes motion that Israel is ‘perpetrating genocide in Gaza’”, *BreakingNews* (7 November 2024), <https://www.breakingnews.ie/israel-hamas/irish-parliament-passes-motion-that-israel-is-perpetrating-genocide-in-gaza-1692532.html>; Micheál Martin, @MichealMartinTD, Tweet (11:10 pm, 10 November 2024), <https://x.com/MichealMartinTD/status/1855553619149328477>.

¹⁰⁸ “Malaysia to seek Israel’s expulsion from the UN over Gaza violations”, *The New Arab* (5 November 2024), <https://www.newarab.com/news/malaysia-seek-israels-expulsion-un-over-gaza-violations>.

¹⁰⁹ António Guterres, @antonioguterres, Tweet (5:29 pm, 27 October 2024), <https://x.com/antonioguterres/status/1850560526964982166>.

¹¹⁰ UN Human Rights Palestine, @OHCHR_Palestine, Tweet (9:44 pm, 20 October 2024), https://x.com/OHCHR_Palestine/status/1848087887172059371.

¹¹¹ United Nations Geneva, @UNGeneva, Tweet (5:00 pm, 28 October 2024), <https://x.com/UNGeneva/status/1850915671229481161>.

¹¹² United Nations Geneva, @UNGeneva, Tweet (5:00 pm, 31 October 2024), <https://x.com/UNGeneva/status/1852002802458882531>.

¹¹³ United Nations Geneva, @UNGeneva, Tweet (5:00 pm, 28 October 2024), <https://x.com/UNGeneva/status/1850915671229481161>.

¹¹⁴ ICRC, @ICRC, Tweet (3:30 pm, 27 October 2024), <https://x.com/ICRC/status/1850530394661118246>; The United Nations Human Rights Office warning, that such “attacks in northern Gaza, combined with mass evacuation orders, which are inconsistent with international humanitarian law, raise serious concerns about the forced displacement and forced transfer of Palestinian residents of Gaza.”: UN OCHA, *Humanitarian Situation Update #227 | Gaza Strip* (8 October 2024), <https://www.ochaopt.org/content/humanitarian-situation-update-227-gaza-strip>.

¹¹⁵ Joyce Msuya, @JoyceMsuya, Tweet (10:22 am, 26 October 2024), <https://x.com/JoyceMsuya/status/1850090614861283387>.

of dying from disease, famine and violence”,¹¹⁶ yet the genocide continued “unabated”,¹¹⁷ a “complete breakdown of our common humanity”.¹¹⁸

26. Palestinian lives depend on maintaining the ceasefire,¹¹⁹ an urgent end to Israel’s impunity, and an end to the aiding and abetting of its criminal and violative conduct.
27. On 19 December 2024 the United Nations General Assembly adopted Resolution A/RES/79/232 requesting an Advisory Opinion from the ICJ on the following question: “What are the obligations of Israel, as an occupying Power and as a member of the United Nations, in relation to the presence and activities of the United Nations, including its agencies and bodies, other international organizations and third States, in and in relation to the Occupied Palestinian Territory, including to ensure and facilitate the unhindered provision of urgently needed supplies essential to the survival of the Palestinian civilian population as well as of basic services and humanitarian and development assistance, for the benefit of the Palestinian civilian population, and in support of the Palestinian people’s right to self-determination?”.¹²⁰ An overwhelming majority of States supported the adoption of the Resolution¹²¹, which signals the widespread concerns of States in relation to Israel’s conduct.

III. REPORTS OF ISRAEL’S PATTERNS OF GENOCIDAL CONDUCT

28. South Africa has continued to collate the repeated and open statements made by Israeli officials in Government and the military that evidence direct intent to commit genocidal acts. That is presented in detail in Annexes I-IV of this Dossier. In addition, the publicly available information allows a consideration of the multiple patterns of attacks by Israel that, through their scale and nature, give rise to an inescapable inference of genocidal intent.
29. In *Croatia v Serbia*, the ICJ recognised that genocidal intent may be inferred from patterns of conduct that demonstrate the systematic nature of attacks against individuals because of their membership of a particular group.¹²² For identifying patterns of conduct, the Court considered that “the most important [factors for considering genocidal intent] are those that concern the *scale* and allegedly *systematic nature* of the attacks, the fact that those attacks are said to have caused casualties and damage far in excess of what was justified by military necessity, the specific targeting of [members of the protected group] and the nature, extent and degree of the injuries caused to the [protected] population.”¹²³
30. Israel’s acts are not random isolated occurrences. Located at the culmination of a historical continuum of apartheid, unlawful occupation and siege, they constitute a pattern of action from which the only reasonable explanation is the breach of the Genocide Convention — and the *jus cogens* norm of the prohibition of genocide.

¹¹⁶ Inter-Agency Standing Committee, *Statement by Principals of the Inter-Agency Standing Committee - Stop the assault on Palestinians in Gaza and on those trying to help them* (1 November 2024), <https://interagencystandingcommittee.org/inter-agency-standing-committee/statement-principals-inter-agency-standing-committee-stop-assault-palestinians-gaza-and-those-trying>.

¹¹⁷ UN OHCHR, *The long human tragedy of the Nakba and Israel's settler colonial genocide – UN expert* (31 October 2024), <https://www.ohchr.org/en/press-releases/2024/10/long-human-tragedy-nakba-and-israels-settler-colonial-genocide-un-expert>.

¹¹⁸ António Guterres, @antonioguterres, Tweet (10:15 pm, 6 December 2024), <https://x.com/antonioguterres/status/1865143055461806319>.

¹¹⁹ Tedros Adhanom Ghebreyesus, @DrTedros, Tweet (4:37 pm, 26 October 2024), <https://x.com/DrTedros/status/1850185021400691126>.

¹²⁰ UNGA, Res. 79/232, *Request for an advisory opinion of the International Court of Justice on the obligations of Israel in relation to the presence and activities of the United Nations, other international organizations and third States*, A/RES/79/232 (19 December 2024), <https://www.undocs.org/A/RES/79/232>, p.5.

¹²¹ 137 votes to 12, with 22 abstentions, <https://docs.un.org/en/A/79/PV.54>

¹²² *Application of the Convention on the Prevention and Punishment of the Crime of Genocide ('Croatia v. Serbia')*, Judgment, I.C.J. Reports 2015, p. 64, para. 139.

¹²³ *Ibid.*, p. 121, para. 413 (emphasis added).

31. Each of the patterns identified tells a devastating story of its own. However, the true extent of the design behind the patterns of conduct is seen when the patterns are overlaid and interlinked. For example, the displacement of Palestinians is not random — Forensic Architecture maps that it has taken place systematically to displace people from the north to the south *and* simultaneously from the east to the west, corralling displaced people into the south-west region of Gaza.¹²⁴
32. Having displaced Palestinians from the most fertile agricultural areas of Gaza (mainly in the east), the agricultural lands were subsequently destroyed, decimating the capacity of current and future generations of Palestinians to produce food.¹²⁵ The destruction of local sources of food production has been carried out simultaneously with the throttling of the entry of aid through the closure of key crossings such as Rafah, arbitrary rejections, delays and onerous inspection protocols, creating a hostile environment for aid distribution by attacking aid seekers, personnel, storage facilities, and distribution networks when they became salient,¹²⁶ failing to hold to account those obstructing aid and denying aid through its campaign to end UNRWA's operations that has intensified significantly over the past month.¹²⁷ Cumulatively, these patterns of conduct have created unbearable living conditions,¹²⁸ have starved Palestinians in Gaza¹²⁹, with children being starved at “the fastest rate the world has ever seen”¹³⁰ — and sought to publicly justify such a policy of starvation¹³¹ — most recently causing the Famine Review Committee to issue an alert urging immediate action “within days not weeks”.¹³² Israel has the capacity to act — as evinced by its improvement in allowing the entry of aid in 2025 in response to the ceasefire — but repeatedly has chosen not to, maintaining Palestinians at a highly vulnerable “immediate pre-famine level” that demonstrates “how closely hunger conditions in Gaza hinge[] on the Israeli government’s position on aid and commercial access to

¹²⁴ Forensic Architecture, *A Spatial Analysis of the Israeli Military's Conduct in Gaza since October 2023* (15 October 2024), https://content.forensic-architecture.org/wp-content/uploads/2024/10/FA_A-Spatial-Analysis-of-the-Israeli-militarys-conduct-in-Gaza-since-October-2023.pdf, pp. 11-13.

¹²⁵ Forensic Architecture, *A Spatial Analysis of the Israeli Military's Conduct in Gaza since October 2023* (15 October 2024), https://content.forensic-architecture.org/wp-content/uploads/2024/10/FA_A-Spatial-Analysis-of-the-Israeli-militarys-conduct-in-Gaza-since-October-2023.pdf, p. 787; fig. 8.14-8.17 and 8.23. See also, UNGA, *Report of the Special Rapporteur on the Right to Food, Michael Fakhri: Starvation and the right to food, with an emphasis on the Palestinian people's food sovereignty*, UN Doc A/79/171 (17 July 2024), <https://undocs.org/A/79/171>, paras. 2, 77 and 111.

¹²⁶ See generally, Forensic Architecture, *A Spatial Analysis of the Israeli Military's Conduct in Gaza since October 2023* (15 October 2024), https://content.forensic-architecture.org/wp-content/uploads/2024/10/FA_A-Spatial-Analysis-of-the-Israeli-militarys-conduct-in-Gaza-since-October-2023.pdf, pp. 720-785.

¹²⁷ See, more recently, a letter from the US Secretary of State and US Secretary of Defense to the Israeli Ministers of Defense and Strategic Affairs at: Barak Ravid, @BarakRavid, Tweet (3:33 pm, 15 October 2024) <https://x.com/BarakRavid/status/1846182689222664471>; See also an assessment of Israel's failure to comply at: Refugees International, *Scorecard: Israel Fails to Comply with U.S. Humanitarian Access Demands in Gaza* (12 November 2024), <https://www.refugeesinternational.org/reports-briefs/scorecard-israel-fails-to-comply-with-u-s-humanitarian-access-demands-in-gaza/>; See also UNRWA, *'More people will die': How Israel's UNRWA ban affects Palestinians in Gaza and beyond* (10 November 2024), <https://www.unrwa.org/newsroom/official-statements/'more-people-will-die'-how-israel's-unrwa-ban-affects-palestinians-gaza-and-beyond>.

¹²⁸ See, e.g., UNRWA, *The Secretary-General Remarks at High-level Ministerial Meeting in Support of the United Nations Relief and Works Agency for Palestine Refugees in the Near East (UNRWA)* (27 September 2024), <https://www.unrwa.org/newsroom/official-statements/secretary-general-remarks-high-level-ministerial-meeting-support-UNRWA>.

¹²⁹ UN Special Rapporteur on the Right to Food, Michael Fakhri, “Opinion — The long, slow violence of starvation in Gaza”, *Anadolu Agency* (14 February 2024), <https://www.aa.com.tr/en/analysis/opinion-the-long-slow-violence-of-starvation-in-gaza/3136094>; See also IPC, *IPC Global Initiative - Special Brief* (8 November 2024), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_Gaza_Strip_Acute_Food_Insecurity_Malnutrition_Sept2024_Aug2025_Special_Brief.pdf, p. 2.

¹³⁰ Medical Aid for Palestinians, @MedicalAidPal, Tweet (1:59 pm, 29 February 2024), <https://twitter.com/MedicalAidPal/status/1763172220900151317>.

¹³¹ “Smotrich: It may be ‘justified’ to starve 2 million Gazans, but world won’t let us” *The Times of Israel* (5 August 2024), <https://www.timesofisrael.com/smotrich-it-may-be-justified-to-starve-2-million-gazans-but-world-wont-let-us/>.

¹³² IPC, *IPC Famine Review Committee Alert: Gaza Strip* (8 November 2024), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_FRC_Alert_Gaza_Nov2024.pdf, p.1.

Gaza”.¹³³ There is no other reasonable explanation for why the Israeli Government would take these steps.

33. As regards the manner in which displacement has taken place, Israeli authorities have repeatedly announced evacuation orders to evacuate to indistinct areas, such as ‘south of Wadi Gaza’, or areas with “ambiguous and elastic” boundaries such as the ‘Al-Mawasi humanitarian zone’.¹³⁴ Neither of these ‘safe’ or ‘humanitarian’ zones are defined with any precision (roads or landmarks).¹³⁵ Since 6 May 2024, six different versions of the boundaries of the Al Mawasi ‘expanded humanitarian zone’ have been published.¹³⁶ Even after Israel had designated Al Mawasi as a humanitarian zone it continued to attack it by aerial bombardment at least 11 times between 6 May 2024 and 30 August 2024, including an airstrike on 24 May 2024, the date of the third provisional measures order by the Court,¹³⁷ and through expanding their ground invasion.¹³⁸ Israel has continued to attack other ‘safe’ or ‘humanitarian’ zones once Palestinians have been displaced to them, particularly in the south,¹³⁹ and displaced Palestinians have continued to be attacked when evacuating even while using ‘safe routes’ designated by Israeli authorities.¹⁴⁰
34. Displaced Palestinians seek shelter in places appearing to be safe – like schools or hospitals in ‘safe zones’. Yet, nowhere is safe in Gaza.¹⁴¹ The timing and nature of attacks on places of shelter reveal that there is no regard for international humanitarian law, and that this is deliberate. As analysis by Forensic Architecture shows “the timing of the Israeli military’s attacks on hospitals correlates with the presence of displaced civilians at those hospitals”.¹⁴²
35. The scale of the attacks indicates the intent to destroy life and life-sustaining infrastructure in Gaza. Forensic Architecture records the scale of the destruction as isolating entire areas from access to life-saving medical infrastructure and evacuation routes.¹⁴³ Further, between 7 October 2023 and 1 August 2024, Forensic Architecture finds that 75 per cent of schools were attacked, 81 per cent of universities were attacked, 57 per cent of health facilities were attacked — with 31 of 36 hospitals in Gaza being targeted and 35 of 36 hospitals going out of service at one or more points in time,¹⁴⁴ 71 per cent of shelters were attacked, 53 per cent of utilities were attacked, 80 per cent

¹³³ Refugees International, *Untangling the Reality of Famine in Gaza* (September 2024),

<https://d3jwam0i5codb7.cloudfront.net/wp-content/uploads/2024/09/Gaza-Famine-Report-REVISED.pdf>, p. 18.

¹³⁴ Forensic Architecture, *A Spatial Analysis of the Israeli Military’s Conduct in Gaza since October 2023 (15 October 2024)*, Chapter 3: Displacement, https://content.forensic-architecture.org/wp-content/uploads/2024/10/FA_A-Spatial-Analysis-of-the-Israeli-militarys-conduct-in-Gaza-since-October-2023.pdf, p. 133.

¹³⁵ See, demonstrating a pattern of such conduct since October 2023 at: Forensic Architecture, *Humanitarian Violence: Israel’s Abuse of Preventative Measures in its 2023-2024 Genocidal Military Campaign in the Occupied Gaza Strip* (7 March 2024), https://content.forensic-architecture.org/wp-content/uploads/2024/03/Humanitarian-Violence_Report_FA.pdf, pp. 53–57.

¹³⁶ Forensic Architecture, *A Spatial Analysis of the Israeli Military’s Conduct in Gaza since October 2023 (15 October 2024)*, Chapter 3: Displacement, p. 133.

¹³⁷ *Ibid*, Chapter 3: Displacement, fig. 3.48, p. 182; and fig. 3.49, p. 183.

¹³⁸ *Ibid*, Chapter 8: Cross-sectional Analysis, fig. 8.10, p. 797; and Chapter 3: Displacement, p. 152.

¹³⁹ *Ibid*, Chapter 1: Introduction, p. 45; Chapter 3: Displacement, pp. 120 and 181.

¹⁴⁰ UN HRC, *Detailed findings on the military operations and attacks carried out in the Occupied Palestinian Territory from 7 October to 31 December 2023*, A/HRC/56/CRP.4 (10 June 2024), <https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session56/a-hrc-56-crp-4.pdf>, paras. 426–428. See also, Forensic Architecture, *A Spatial Analysis of the Israeli Military’s Conduct in Gaza since October 2023 (15 October 2024)*, Chapter 3: Displacement, p.184; and fig. 3.51, p. 185.

¹⁴¹ United Nations, “Nowhere is safe. Everywhere is a potential killing zone” in Gaza, Remarks by the United Nations Secretary-General, António Guterres, at the opening of the UNRWA Pledging Conference (12 July 2024) <https://www.un.org/unispal/document/sg-remarks-unrwa-12jul24/>.

¹⁴² Forensic Architecture, *A Spatial Analysis of the Israeli Military’s Conduct in Gaza since October 2023 (15 October 2024)*, Chapter 5: Destruction of Medical Infrastructure, p. 417; and fig. 5.47, p. 418.

¹⁴³ *Ibid*, Chapter 6: Destruction of Civilian Infrastructure, pp. 580–589.

¹⁴⁴ *Ibid*, Chapter 5: Destruction of Medical Infrastructure, p. 340.

of religious institutions and 91 per cent of cultural heritage sites were attacked.¹⁴⁵ Between 7 October 2023 and 30 June 2024, these attacks also extended to the environment and food production systems, with 45 per cent of greenhouses destroyed, 70 per cent of Gaza's agricultural land destroyed, 83 per cent of all plant life in Gaza destroyed, and rendering 100 per cent of all wastewater plants non-functional.¹⁴⁶

36. Israel has also engaged in conduct that *on its own* indicates that there can be no other reasonable explanation other than genocidal intent. In addition to its policy of starvation, Israel has specifically targeted children in its military campaign. The United Nations Commission of Inquiry has recorded that “[m]edical professionals told the Commission that they have treated children with direct gunshot wounds, indicating direct targeting of children.”¹⁴⁷ Doctors’ published testimonies corroborate this, with 44 doctors, nurses and paramedics having reported treating multiple instances of pre-teen children having been shot in the head or chest¹⁴⁸ — this evidence having been confirmed by independent experts.¹⁴⁹ Doctors have also testified that children have been targeted by quadcopters while injured and by snipers.¹⁵⁰ Children have been targeted leaving shelters and enroute to hospitals;¹⁵¹ as well as attempting to follow evacuation orders and enroute to ‘safe zones’.¹⁵² There can be no military objective that can justify the targeting of children.
37. South Africa highlights 10 patterns that are prevalent from the publicly available evidence.

A: The pattern of Israel targeting the vulnerable, including children, women, the wounded and disabled, and those who have repeatedly been displaced and are seeking shelter

38. Since 7 October 2023, Israel has systematically targeted and attacked the most vulnerable members of the Palestinian population of Gaza¹⁵³ — children, women, persons with disabilities, the elderly, the sick and starving and those who have been repeatedly displaced from their homes and communities by Israel’s relentless

¹⁴⁵ *Ibid*, Chapter 6: Destruction of Civilian Infrastructure, p. 507.

¹⁴⁶ *Ibid*, Chapter 4: Destruction of Agriculture and Water Resources, p. 242.

¹⁴⁷ UNGA, *Report of the Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel*, A/79/232 (11 September 2024), <https://documents.un.org/doc/undoc/gen/n24/262/79/pdf/n2426279.pdf>, p. 9, para. 36.

¹⁴⁸ Feroze Sidhwa, “65 Doctors, Nurses and Paramedics: What We Saw in Gaza”, *New York Times* (9 October 2024), <https://www.nytimes.com/interactive/2024/10/09/opinion/gaza-doctor-interviews.html>.

¹⁴⁹ “Response to Recent Criticisms on New York Times Opinion”, *New York Times* (15 October 2024), <https://www.nytimes.com/press/response-to-recent-criticisms-on-new-york-times-opinion-essay/>.

¹⁵⁰ Dania Akkad, “Israeli drones shooting children in Gaza deliberately ‘day after day’, UK surgeon tells MPs”, *Middle East Eye* (13 November 2024), <https://www.middleeasteye.net/news/gaza-war-british-surgeon-tells-mps-account-nasser-hospital>; and Burak Bir, “Israeli snipers targeted children with ‘single shot to the head’ in Gaza: UK surgeon”, *Anadolu Agency* (13 November 2024), <https://www.aa.com.tr/en/middle-east/israeli-snipers-targeted-children-with-single-shot-to-the-head-in-gaza-uk-surgeon/3392291>. Original testimony available at: UK Parliament, Parliament Live TV, International Development Committee Hearings (12 November 2024), <https://parliamentlive.tv/Event/Index/8bf26f77-1964-45cf-a141-0f78ab9d00ab>.

¹⁵¹ Riley Mellen *et al.*, “Visual Investigation: How a Single Family Was Shot Dead on a Street in Gaza”, *New York Times* (6 September 2024), <https://www.nytimes.com/video/world/middleeast/100000009614868/israel-gaza-war-family-killed.html>; and “Israeli sniper kills Palestinian girl in front of Gaza hospital”, *Al Jazeera* (8 February 2024), <https://www.aljazeera.com/program/newsfeed/2024/2/8/israeli-sniper-kills-palestinian-girl-in-front-of-gaza-hospital>.

¹⁵² “Two brothers shot by Israeli forces in Khan Younis, white flag ignored”, *Al Jazeera* (29 January 2024), <https://www.aljazeera.com/news/2024/1/29/two-brothers-shot-by-israeli-forces-in-khan-younis-white-flag-ignored>.

¹⁵³ For example, Amnesty International conducted in-depth investigations into 15 Israeli airstrikes that took place between 7 October 2023 and 20 April 2024, which struck “12 homes and other residential buildings, a church, a street and a public market – all of them located densely populated urban areas”. These attacks killed 334 civilians, including 141 children, and wounded “hundreds”. Amnesty International was unable to find “any evidence that any of the strikes were directed at a military objective”, and “all available evidence showed that those killed were civilians not taking a direct part in hostilities”. Amnesty sent these findings to the Israeli Ministry of Defence but, despite numerous follow-ups, received no substantive response. Amnesty International, *‘You Feel Like You Are Subhuman’: Israel’s Genocide Against Palestinians in Gaza* (5 December 2024), <https://www.amnesty.org/en/documents/mde15/8668/2024/en/>, pp. 18-19 and pp. 45-46.

displacement orders. Israel has acted with calculated brutality against these vulnerable groups, killing and injuring thousands of them and inflicting on all of them conditions of life calculated to bring about the physical destruction of the group of Palestinians in Gaza. Of the more than 10,000 Palestinians reported missing or under the rubble, at least half of them are assumed to be women and children.¹⁵⁴ An estimated 63 women, including 37 mothers have been killed *daily* in Gaza and at least 17,000 Palestinian children are believed to have been orphaned since the war on Gaza began,¹⁵⁵ or “are unaccompanied or separated from their families, travelling alone, crossing checkpoints, unable to access supplies or services, and at risk of starvation, abuse, and exploitation.”¹⁵⁶

39. For Palestinian children, “[d]eath is everywhere” and “nowhere is safe.”¹⁵⁷ As of 19 November 2024, a total of 13,319 Palestinian children had been identified as killed in Gaza since 7 October 2023.¹⁵⁸ It is estimated that more Palestinian children were killed in the first three weeks in Gaza alone (a total of 3,195) than the total number of children killed each year across the world’s conflict zones since 2019.¹⁵⁹ During the first month of its military offensive in Gaza, Israel mostly killed children,¹⁶⁰ the overwhelming number of which were killed in their homes by heavy munitions, no doubt while sheltering and terrified with their families.¹⁶¹ In the first few months of Israel’s attacks in Gaza, an average of over 120 Palestinian children in Gaza were killed *every day*.¹⁶²
40. There is overwhelming evidence, corroborated by multiple sources, that Israel has deliberately targeted children. Reports of gunshot wounds in children caused by sniper fire and quadcopters have been corroborated by the testimonies of numerous doctors, some of which witnessed “the targeting of children with gunfire . . . literally

¹⁵⁴ UN OHCHR, *Onslaught of violence against women and children in Gaza unacceptable: UN experts* (6 May 2024), <https://www.ohchr.org/en/press-releases/2024/05/onslaught-violence-against-women-and-children-gaza-unacceptable-un-experts>. UN Women estimates the number to be even higher: UN Women, *Six months into the war on Gaza, over 10,000 women have been killed, among them an estimated 6,000 mothers, leaving 19,000 children orphaned* (16 April 2024), <https://www.unwomen.org/en/news-stories/press-release/2024/04/six-months-into-the-war-on-gaza-over-10000-women-have-been-killed>.

¹⁵⁵ *Ibid.*

¹⁵⁶ UN OHCHR, *Call for Action: Urgency Humanitarian Response for Gaza* (11 June 2024), <https://www.ohchr.org/en/statements-and-speeches/2024/06/call-action-urgent-humanitarian-response-gaza>.

¹⁵⁷ UNICEF, *Press Release: The war on children resumes: Geneva Palais briefing note* (1 December 2023), <https://www.unicef.org/press-releases/war-children-resumes-geneva-palais-briefing-note>; and James Elder (UNICEF Spokesperson), *Bearing witness: No safety for children in Gaza* (15 December 2023), <https://www.unicef.org/blog/bearing-witness-no-safety-children-gaza>.

¹⁵⁸ UN OCHA, *Reported impact snapshot | Gaza Strip (19 November 2024)* (19 November 2024), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-19-november-2024>. These figures do not include those among the dead who had not yet been identified.

¹⁵⁹ Save the Children, *GAZA: 3,195 children killed in three weeks surpasses annual number of children killed in conflict zones since 2019* (29 October 2023), <https://www.savethechildren.net/news/gaza-3195-children-killed-three-weeks-surpasses-annual-number-children-killed-conflict-zones>.

¹⁶⁰ Airwars, *Civilian Harm Analysis: Gaza, October 2023* (October 2024), <https://airwars.org/research/civilian-harm-patterns-gaza-october-2023/>, Annex-2: Patterns of Death, Children and Annex-7: Comparative Results. UNRWA, *UNRWA Situation Report #24 on the Situation in the Gaza Strip and the West Bank, including East Jerusalem* (7 November 2023), <https://www.unrwa.org/resources/reports/unrwa-situation-report-24-situation-gaza-strip-and-west-bank-including-east-jerusalem>.

¹⁶¹ Airwars, *Civilian Harm Analysis: Gaza, October 2023* (October 2024), <https://airwars.org/research/civilian-harm-patterns-gaza-october-2023/>, Annex-2: Patterns of Death, Children (noting: “Of the minimum 1,900 children killed, 1,750 (91%) were killed in incidents involving the destruction of a residential building, at least 566 children were recorded killed in attacks on IDP or refugee settlements, and at least 66 children were killed in incidents involving the destruction of religious sites.”)

¹⁶² UN OCHA, *Hostilities in the Gaza Strip and Israel — reported impact | Day 73* (19 December 2023), <https://www.ochaopt.org/content/hostilities-gaza-strip-and-israel-reported-impact-day-73>; and UN Türkiye, *Gaza crisis: Aid agencies warn of ‘tragic, avoidable surge’ in child deaths* (22 November 2023), <https://turkiye.un.org/en/253479-gaza-crisis-aid-agencies-warn-%E2%80%98tragic-avoidable-surge%E2%80%99-child-deaths>.

every day”.¹⁶³ The United Nations Commission of Inquiry contains evidence of doctors “treat[ing] children with direct gunshot wounds, indicating direct targeting of children.”¹⁶⁴ *The New York Times* and others have published reports by doctors in Gaza indicating a pattern of targeting and shooting children, particularly in and around hospitals and places of shelter.¹⁶⁵

41. Israel’s war on Gaza has also been described as “a war on women”,¹⁶⁶ because of the “numbers who have been killed and injured, and the overall level of devastation that women there are facing.”¹⁶⁷ Between early October 2023 and 22 July 2024, an estimated 37 mothers were killed daily, leaving families devastated and children vulnerable.¹⁶⁸ United Nations experts note that women, girls and children are among those most exposed to danger in this conflict, and that as of 19 November 2024, of the 40,717 identified deaths in Gaza, 7,216 are women; 13,319 are children and 3,447 are elderly¹⁶⁹ — these vulnerable groups making up over 60 per cent of those killed.¹⁷⁰ Close to one million women and girls in Gaza have been forcibly displaced, facing exacerbated protection risks in overcrowded shelters lacking necessities and privacy,¹⁷¹ leaving women and girls (and pregnant women in particular) vulnerable with almost no access to safe water, latrines, washrooms, or sanitary pads.¹⁷² On 27 June 2024, United Nations Women estimated that at least 557,000 women in Gaza were facing severe food insecurity.¹⁷³ Teenage girls declared that they “hoped to be killed” to “end their nightmare.”¹⁷⁴

¹⁶³ Arab 48 Website @arab48website, Tweet (10:49am, 22 August 2024), <https://x.com/arab48website/status/1826542291789443244>; Mark Perlmutter and Firoze Sidhwa, “We volunteered at a Gaza hospital. What we saw was unspeakable”, *Politico* (19 July 2024), <https://www.politico.com/news/magazine/2024/07/19/gaza-hospitals-surgeons-00167697>; United Kingdom Parliament, parliamentlive.tv, *International Development Committee, Tuesday 12 November 2024* (12 November 2024), <https://parliamentlive.tv/event/index/8bf26f77-1964-45cf-a141-0f78ab9d00ab>, [14:09:00-14:15].

¹⁶⁴ UNGA, *Commission of Inquiry Report* (11 September 2024), p. 9, para. 36, (footnotes omitted).

¹⁶⁵ Feroze Sidhwa, “65 Doctors, Nurses and Paramedics: What We Saw in Gaza”, *New York Times* (9 October 2024), <https://www.nytimes.com/interactive/2024/10/09/opinion/gaza-doctor-interviews.html>. See “Response to Recent Criticisms on New York Opinion Essay”, *New York Times* (15 October 2024), <https://www.nytimes.com/press/response-to-recent-criticisms-on-new-york-times-opinion-essay/>; Riley Mellen *et al.*, “Visal Investigation: How a Single Family Was Shot Dead on a Street in Gaza”, *New York Times* (6 September 2024), <https://www.nytimes.com/video/world/middleeast/100000009614868/israel-gaza-war-family-killed.html>. See also “Two brothers shot by Israeli forces in Khan Younis, white flag ignored”, *Al Jazeera* (29 January 2024), <https://www.aljazeera.com/news/2024/1/29/two-brothers-shot-by-israeli-forces-in-khan-younis-white-flag-ignored>; and “Israeli sniper kills Palestinian girl in front of Gaza hospital”, *Al Jazeera* (8 February 2024), <https://www.aljazeera.com/program/newsfeed/2024/2/8/israeli-sniper-kills-palestinian-girl-in-front-of-gaza-hospital>.

¹⁶⁶ UN Women, *Scarcity and Fear: A Gender Analysis of the Impact of the War in Gaza on Vital Services Essential to Women’s and Girls’ Health, Safety, and Dignity — Water, Sanitation and Hygiene (WASH)* (April 2024), <https://reliefweb.int/attachments/f980980a-e9ff-4edb-933f-46c621726cb9/gender-alert-gender-analysis-of-the-impact-of-the-war-in-gaza-on-vital-services-essential-to-womens-and-girls-health-safety-en.pdf>, p. 5.

¹⁶⁷ UN Women, *No end in sight to the ‘war on women’ in Gaza* (18 July 2024), <https://news.un.org/en/story/2024/07/1152246>.

¹⁶⁸ World Health Organization (‘WHO’) and UN Health Cluster, *Public Health Situation Analysis* (22 July 2024), <https://reliefweb.int/attachments/d8c5c51e-8549-472e-9440-9ee59c00f4d0/WHO%20PHSA%20oPt%20220724%20FINAL.pdf>, p. 9.

¹⁶⁹ UN OCHA, *Reported impact snapshot | Gaza Strip (19 November 2024)* (19 November 2024), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-19-november-2024>.

¹⁷⁰ UN OCHA, *Reported impact snapshot | Gaza Strip (18 September 2024)*, <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-18-september-2024>.

¹⁷¹ United Nations Population Fund (‘UNFPA’), *UNFPA Palestine Situation Report #7* (6 April 2024), <https://www.unfpa.org/resources/unfpa-palestine-situation-report-7-6-april-2024>, p. 2.

¹⁷² UN Women, *Scarcity and Fear: A Gender Analysis of the Impact of the War in Gaza on Vital Services Essential to Women’s and Girls’ Health, Safety, and Dignity — Water, Sanitation and Hygiene (WASH)* (April 2024), <https://reliefweb.int/attachments/f980980a-e9ff-4edb-933f-46c621726cb9/gender-alert-gender-analysis-of-the-impact-of-the-war-in-gaza-on-vital-services-essential-to-womens-and-girls-health-safety-en.pdf>, p. 5. See UN Office at Geneva, *Gaza humanitarian update WHO-OCHA-UN Women* (21 June 2024), <https://www.unognewsroom.org/story/en/2237/gaza-humanitarian-update-who-ocha-un-women-21-june-2024>.

¹⁷³ UN Women, *At least 557,000 women in Gaza are facing severe food insecurity* (27 June 2024), <https://www.unwomen.org/en/news-stories/news/2024/06/at-least-557000-women-in-gaza-are-facing-severe-food-insecurity>.

¹⁷⁴ Middle East Eye, @MiddleEastEye, Tweet (3:00 pm, 27 March 2024), <https://twitter.com/MiddleEastEye/status/1772986936820748464>.

42. Since 7 October 2023, at least 10,000 Palestinians have become disabled — about *half* of them children,¹⁷⁵ including more than 1,000 children who have had their limbs amputated.¹⁷⁶ The United Nations Committee on the Rights of Persons with Disabilities has warned that “survival and the physical and mental integrity of persons with disabilities remains at stake. [Persons with disabilities] are at higher risk of dying, becoming injured and acquiring further impairments.”¹⁷⁷ In addition to being attacked and targeted by Israeli forces, the majority of sick, wounded and disabled Palestinians in Gaza have been unable to receive necessary care,¹⁷⁸ and are at higher risk of communicable diseases, malnutrition and death.¹⁷⁹ They lack necessary assistance devices, including crutches, wheelchairs and prostheses, and required care.¹⁸⁰ Meanwhile, Israeli soldiers repeatedly post photographs of themselves ‘playing’ with the toys of displaced or dead Palestinian children,¹⁸¹ and using disability aids belonging to displaced or dead Palestinians, taken from Palestinian homes or hospitals.¹⁸²
43. Palestinians have had to evacuate their sick, disabled and wounded in a forced march in inhumane conditions from the North to the South — and then again from the South onwards — “Many of the patients were put on wheelchairs or rolling beds. Family members were forced to carry their wounded children or parents themselves.”¹⁸³
44. As discussed below, Israel has also relentlessly attacked those vulnerable Palestinians it has subjected to repeated evacuation orders, and who have been displaced from their homes and communities.¹⁸⁴ As the United Nations Secretary-General explained: “the people of Gaza are being told to move like human pinballs — ricocheting between ever-smaller slivers of the south, without any of the basics for survival.”¹⁸⁵

¹⁷⁵ UN OCHA, *Humanitarian Situation Update #185* (1 July 2024), <https://www.ochaopt.org/content/humanitarian-situation-update-185-gaza-strip>.

¹⁷⁶ Save the Children, *Gaza: More than 10 children a day lose a limb in three months of brutal conflict* (7 January 2024), <https://www.savethechildren.net/news/gaza-more-10-children-day-lose-limb-three-months-brutal-conflict>.

¹⁷⁷ UN OHCHR, *Palestinians with disabilities subject to unbearable consequences of the ongoing hostilities and violence in the OPT* (27 May 2024), <https://www.ohchr.org/en/statements/2024/05/palestinians-disabilities-subject-unbearable-consequences-ongoing-hostilities>.

¹⁷⁸ UN OCHA, *UN Humanitarian Chief Martin Griffiths Calls for Immediate Ceasefire and Humanitarian Access in Gaza Crisis — Briefing to the Security Council on the Situation in the Middle East, Including the Palestinian Question* (31 January 2024), <https://www.un.org/unispal/document/ocha-statement-security-council-31jan-2024/>; UNICEF, @UNICEF, Tweet (3:30 am, 26 October 2024), <https://x.com/UNICEF/status/1849971708658319793>: “If this lethally slow pace continues it would take more than 7 years to evacuate the 2,500 children needing urgent medical care”.

¹⁷⁹ UN OHCHR, *Occupied Palestinian territory and Israel: UN experts call for permanent ceasefire to protect rights and futures of women and girls* (14 December 2023), <https://www.ohchr.org/en/press-releases/2023/12/occupied-palestinian-territory-and-israel-un-experts-call-permanent>; and HRW, *Gaza: Israeli Attacks, Blockade Devastating for People with Disabilities* (1 November 2023), <https://www.hrw.org/news/2023/11/01/gaza-israeli-attacks-blockade-devastating-people-disabilities>.

¹⁸⁰ Annie Sparrow and Kenneth Roth, “Destroying Gaza’s Health Care System Is a War Crime”, *Foreign Policy* (9 February 2024), <https://foreignpolicy.com/2024/02/09/israel-gaza-health-care-hospitals-genocide-icj/>.

¹⁸¹ Younis Tirawi, @ytirawi, Tweet (6:42 pm, 23 February 2024), <https://twitter.com/ytirawi/status/1761084227846648004>; Younis Tirawi, @ytirawi, Tweet (9:35 pm, 20 February 2024), <https://twitter.com/ytirawi/status/1760040514915553463>; B.M., @ireallyhateyou, Tweet (8:11 pm, 27 February 2024), <https://x.com/ireallyhateyou/status/1762556002711289987>.

¹⁸² Israeli soldiers filmed abusing hospital’s assistive devices”, *Middle East Monitor* (3 February 2024), <https://www.middleeastmonitor.com/20240203-israeli-soldiers-filmed-abusing-hospitals-assistive-devices/>; Jalal, @JalalAK_jojo, Tweet (12:28 am, 22 February 2024), <https://twitter.com/JalalAKjojo/status/1760431314312790255>.

¹⁸³ “Panic as Gaza’s al-Shifa evacuates, Israel army denies ordering it to do so”, *Al Jazeera* (18 November 2023), <https://www.aljazeera.com/news/2023/11/18/israel-gives-gazas-al-shifa-hospital-one-hour-to-evacuate>. See UN OHCHR, *Palestinians with disabilities subject to unbearable consequences of the ongoing hostilities and violence in the OPT* (27 May 2024), <https://www.ohchr.org/en/statements/2024/05/palestinians-disabilities-subject-unbearable-consequences-ongoing-hostilities>.

¹⁸⁴ See Forensic Architecture, *A Cartography of Genocide: Israel’s Conduct in Gaza since October 2023*, <https://forensic-architecture.org/investigation/a-cartography-of-genocide>.

¹⁸⁵ UN OCHA, *Hostilities in the Gaza Strip and Israel | Flash Update #63* (8 December 2023), <https://www.ochaopt.org/content/hostilities-gaza-strip-and-israel-flash-update-63>.

The pattern of Israeli attacks on shelters housing the displaced is evident across the Gaza Strip,¹⁸⁶ resulting in mass casualties.¹⁸⁷

45. Israel's subjection of the most vulnerable members of the protected group to systematic violence evinces Israel's disregard for any basic element of humanity and confirms Israel's destructive intent. Moreover, this level of deliberate killing of children, this level of wounding of children, this level of suffering inflicted on children is consistent with no other inference than that Israel's intention is to destroy the group of Palestinians in Gaza, including by destroying the *future* of the Group — its children.

B: The pattern of Israel denying humanitarian aid to Palestinians in Gaza and the associated policy of starvation of that community

46. Israel has systematically denied lifesaving aid and basic services to Palestinians in Gaza, and deliberately starved a vulnerable population, inflicting measures of 'slow death' calculated to bring about their physical destruction.¹⁸⁸ Israel's conduct is reminiscent of Srebrenica — which the International Court of Justice found to be genocide — in which "[a] number of activities were undertaken that created unbearable living conditions in Srebrenica by way of humanitarian aid restrictions, water, electricity and medical aid shortage."¹⁸⁹ Israel bears obligations as an Occupying Power (albeit an unlawful occupation) to *ensure* access to basic supplies in the occupied Palestinian territories, including Gaza.¹⁹⁰ Israel's failure to fulfil those obligations prior to 7 October 2023¹⁹¹ rendered Palestinians in Gaza almost entirely dependent on humanitarian aid.¹⁹² Since 7 October 2023 Israel has gone a step further and implemented a policy of *denial* of humanitarian aid affecting an already weakened population with full knowledge of the consequences of doing so and with the specific intent to destroy the population. Israel's policy of denying humanitarian aid to Palestinians in Gaza includes the following:
47. ***The policy and pattern of acute hunger, food insecurity and starvation:*** Palestinians are not only being killed or harmed by Israel's military operation, but also from

¹⁸⁶ See Forensic Architecture, *A Spatial Analysis of the Israeli Military's Conduct in Gaza since October 2023* (15 October 2024), p. 46-47.

¹⁸⁷ UN OCHA, *Hostilities in the Gaza Strip and Israel | Flash Update #171* (27 May 2024), <https://www.unocha.org/publications/report/occupied-palestinian-territory/hostilities-gaza-strip-and-israel-flash-update-171-enarhe>; and UN OCHA, *Hostilities in the Gaza Strip and Israel | Flash Update #174* (3 June 2024), <https://www.unocha.org/publications/report/occupied-palestinian-territory/hostilities-gaza-strip-and-israel-flash-update-174>.

¹⁸⁸ See *Prosecutor v. Akayesu*, Trial Chamber I, Judgment (2 September 1998), ICTR-96-4-T, paras. 505 and 506; John Quigley, "'Slow Death' as Genocide: The Convention Was Written for Gaza", *Opinio Juris* (14 October 2024), <https://opiniojuris.org/2024/10/14/slow-death-as-genocide-the-convention-was-written-for-gaza/>.

¹⁸⁹ *Prosecutor v. Trbić*, No. X-KR-07/368, First Instance Verdict, 29 April 2010 ('Trbić Trial Judgment'), https://www.worldcourts.com/wcsbih/eng/decisions/2009.10.16_Prosecutor_v_Trbic.htm, para. 323. See also, *Prosecutor v. Tolimir*, Trial Chamber II, Judgment (12 December 2012), IT-05-88/2-T, ('Tolimir Trial Judgment'), paras. 174 and 204; and *Prosecutor v. Radislav Krstić*, Trial Chamber, Judgment (2 August 2001), IT-98-33-T, ('Krstić Trial Judgment'), paras. 38ff and 337.

¹⁹⁰ See *Legal Consequences Arising from the Policies and Practices of Israel in the Occupied Palestinian Territory, Including East Jerusalem, Advisory Opinion* (19 July 2024), <https://www.icj-cij.org/sites/default/files/case-related/186/186-20240719-adv-01-00-en.pdf> ('Palestine Advisory Opinion'), p. 38, para. 124. See also *South Africa v. Israel, Provisional Measures, Order of 28 March 2024*, Joint Declaration of Judges Xue, Brant, Gómez Robledo and Tladi, p. 1, para. 2.

¹⁹¹ UN HRC, *Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel: Detailed findings on the military operations and attacks carried out in the Occupied Palestinian Territory from 7 October to 31 December 2023*, A/HRC/56/CRP.4 (10 June 2024), <https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session56/a-hrc-56-crp-4.pdf>, p. 61, para. 255.

¹⁹² UNGA, *Economic and social repercussions of the Israeli occupation on the living conditions of the Palestinian people in the Occupied Palestinian Territory, including East Jerusalem, and of the Arab population in the occupied Syrian Golan*, A/78/127-E/2023/95 (30 June 2023), <https://documents.un.org/doc/undoc/gen/n23/189/07/pdf/n2318907.pdf>, p. 14, para. 78.

Israel's policy of starving them to death.¹⁹³ Hunger and dehydration ravaged Gaza. By October 2024, almost the entire population (90 per cent) was facing acute food insecurity levels due to Israel's siege,¹⁹⁴ and almost one million people (approximately 80 per cent) were in catastrophic or emergency conditions,¹⁹⁵ with an "extremely grave and rapidly deteriorating" situation.¹⁹⁶ United Nations experts have explained that it is "unprecedented to make *an entire civilian population go hungry this completely and quickly*. Israel is destroying Gaza's food system and using food as a weapon against the Palestinian people."¹⁹⁷ Israel's starvation campaign has included attacks on bakeries, food storage, aid convoys and food aid recipients in the short term, and the destruction of agricultural land, Gaza's greenhouses, and environmental damage, causing such vast destruction as to turn farmland into dust, resulting in the collapse of Gaza's food resources today and food production systems in the future.¹⁹⁸ Considering the severity of the humanitarian catastrophe, the availability to Israel of evidence of the risk of famine — including in the forms of multiple IPC reports, and warnings from the ICJ — Israel's decisions to double down despite this knowledge, and making minimal changes to the flow of aid to keep people highly vulnerable to short term reductions in food access, indicate the deliberateness of the campaign. The results were increasingly catastrophic, with the Famine Review Committee of the IPC on 8 November 2024 indicating in an IPC Alert that "the worst-case scenario developed by the analysis team is now playing out in areas of the northern Gaza Strip. It can therefore be assumed that starvation, malnutrition, and excess mortality due to malnutrition and disease, are rapidly increasing in these areas. Famine thresholds may have already been crossed or else will be in the near future."¹⁹⁹

48. ***The denial of entry of aid through the closure of crossing points:*** On 9 October 2023, Israel declared a "total siege" on Gaza, allowing no electricity, no food, no water and no fuel to enter the strip.²⁰⁰ Since then, Israel has only intermittently opened — and then promptly closed — some of the key crossings for humanitarian aid and people, despite the international consensus that "[f]or aid delivery at scale there is no meaningful substitute to the many land routes and entry points from Israel into

¹⁹³ UN OCHA, *Hostilities in the Gaza Strip and Israel | Flash Update #133* (6 March 2024), <https://www.ochaopt.org/content/hostilities-gaza-strip-and-israel-flash-update-133>; and WHO, *Lethal combination of hunger and disease to lead to more deaths in Gaza* (21 December 2023), <https://www.who.int/news/item/21-12-2023-lethal-combination-of-hunger-and-disease-to-lead-to-more-deaths-in-gaza>.

¹⁹⁴ IPC, *Gaza Strip: IPC Acute Food Insecurity and Acute Malnutrition Special Snapshot | September 2024 - April 2025* (17 October 2024), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_Gaza_Strip_Acute_Food_Insecurity_Malnutrition_Sep2024_Apr2025_Special_Snapshot.pdf.

¹⁹⁵ IPC, *Gaza Strip: IPC Acute Food Insecurity and Acute Malnutrition Special Snapshot | September 2024 - April 2025* (17 October 2024), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_Gaza_Strip_Acute_Food_Insecurity_Malnutrition_Sep2024_Apr2025_Special_Snapshot.pdf.

¹⁹⁶ IPC, *IPC Famine Review Committee Alert, Gaza Strip* (8 November 2024), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_FRC_Alert_Gaza_Nov2024.pdf.

¹⁹⁷ UN OHCHR, *Over one hundred days into the war, Israel destroying Gaza's food system and weaponizing food, say UN human rights experts* (16 January 2024), <https://www.ohchr.org/en/press-releases/2024/01/over-one-hundred-days-war-israel-destroying-gazas-food-system-and> (emphasis added).

¹⁹⁸ UN OHCHR, *UN Human Rights Office — OPT: UN Human Rights Office strongly deplores killing of at least 112 Palestinians during food aid distribution in Gaza City* (1 March 2024), <https://reliefweb.int/report/occupied-palestinian-territory/un-human-rights-office-strongly-deplores-killing-least-112-palestinians-during-food-aid-distribution-gaza-city-enar>; Forensic Architecture, *A Spatial Analysis of the Israeli Military's Conduct in Gaza since October 2023* (15 October 2024), p. 240 ff.

¹⁹⁹ Integrated Food Security Phase Classification, *IPC Famine Review Committee Alert: Gaza Strip* (8 November 2024), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_FRC_Alert_Gaza_Nov2024.pdf.

²⁰⁰ *South Africa v. Israel, Application of 29 December 2023*, para. 61, (Statement by Yoav Gallant, 9 October 2023, <https://www.youtube.com/watch?v=1nxvS9VY-t0>. Translation at Emanuel Fabian, "Defense minister announces 'complete siege' of Gaza: No power, food or fuel", *The Times of Israel* (9 October 2023), <https://www.timesofisrael.com/liveblogentry/defense-minister-announces-complete-siege-of-gaza-no-power-food-or-fuel/>). See also, UN OCHA, *Hostilities in the Gaza Strip and Israel | Flash Update #6* (12 October 2023), <https://www.ochaopt.org/content/hostilities-gaza-strip-and-israel-flash-update-6>, (noting: Gaza's only power plant is no longer operational, Israel having reportedly threatened to target the plant if it resumes operation).

Gaza.”²⁰¹ This has been done despite the ICJ Orders of 24 May²⁰² and 28 March 2024²⁰³ requiring Israel to open and maintain open all crossings. According to the WFP,²⁰⁴ since Israel’s military offensive began, the daily average of humanitarian trucks entering Gaza has been 118. When combined with the average daily commercial trucks, the average number of trucks is approximately 155 trucks per day — under a third or 31 per cent of the pre-crisis average of 500 trucks *per day*. The Joint Logistics over the Shore, United States built military pier, was operational intermittently for a mere 20 out of the planned 90 days since it commenced its operations on 17 May 2024²⁰⁵ and has since been dismantled, with the mission being announced as closed.²⁰⁶ In addition, Israeli authorities delayed approving routes for safe passage through Gaza causing delays in distribution,²⁰⁷ and prevented the entry of aid workers to run the humanitarian operation by denying them visas and failing to renew their existing visas — further attempting to throttle the delivery of basic services.²⁰⁸

49. ***The denial of entry of aid through arbitrary rejections, delays and onerous inspection protocols:*** Lifesaving aid has also been denied through the application of the dual use list leading to arbitrary rejections and the imposition of onerous inspection protocols by Israeli authorities. Items that were “most frequently rejected” on what aid workers consider an “apparent ghost list” included essential medical supplies: anaesthesia machines and anaesthetics, crutches, generators, ventilators, x-ray machines and oxygen cylinders.²⁰⁹ Other “basic and lifesaving items” have been denied entry including solar lights, water cleaning tablets, cancer medicines, maternity kits, water pipe fittings, water quality control testing kits — continually rejected since December 2023,²¹⁰ hygiene materials, survivor blankets, candles,

²⁰¹ UN Office for Project Services (‘UNOPS’), *Joint Statement on the opening of a maritime corridor to Gaza* (12 March 2024), <https://www.unops.org/news-and-stories/speeches/joint-statement-on-the-opening-of-a-maritime-corridor-to-gaza>; and UN News, *Gaza: Aid delivery via floating dock welcomed, but land routes ‘more important’* (17 May 2024), <https://news.un.org/en/story/2024/05/1149906>.

²⁰² *South Africa v. Israel*, Provisional Measures, Order of 24 May 2024, p. 13, para. 52.

²⁰³ *South Africa v. Israel*, Order of the Court on South Africa’s request for modification of provisional measures, 28 March 2024 (Provisional Measures, Order of 28 March 2024), p. 9, para. 35.

²⁰⁴ WFP Palestine, *Market Monitor — Gaza: WFP Palestine/ Food Security Analysis* (August 2024), <https://docs.wfp.org/api/documents/WFP-0000160906/download/>.

²⁰⁵ U.S. Agency for International Development (‘USAID’), Office of the Inspector General, *USAID’s Gaza Response: External Factors Impaired Distribution of Humanitarian Assistance Through the JLOTS Maritime Corridor*, Report E-000-24-004-M (27 August 2024), <https://oig.usaid.gov/sites/default/files/2024-08/OIG%20Final%20Report%20-%20JLOTS%20Maritime%20Corridor%20Evaluation.pdf>, pp. 4 and 8.

²⁰⁶ C. Todd Lopez, U.S. Department of Defense, “While JLOTS Mission Has Concluded, Several Million Pounds of Aid Remain to be Delivered”, *DOD News* (19 July 2024), <https://www.defense.gov/News/News-Stories/Article/Article/3844184/while-jlots-mission-has-concluded-several-million-pounds-of-aid-remain-to-be-de/>.

²⁰⁷ USAID, Office of the Inspector General, *USAID’s Gaza Response: External Factors Impaired Distribution of Humanitarian Assistance Through the JLOTS Maritime Corridor*, Report E-000-24-004-M (27 August 2024), <https://oig.usaid.gov/sites/default/files/2024-08/OIG%20Final%20Report%20-%20JLOTS%20Maritime%20Corridor%20Evaluation.pdf>, p.13.

²⁰⁸ UN The Question of Palestine, *The Israeli Authorities have stopped giving visas to heads and staff of the international NGO community — Statement from Philippe Lazzarini, UNRWA Commissioner-General* (20 September 2024), <https://www.un.org/unispal/document/unrwa-statement-20sep24/>; Julia Frankel, “Leading NGOs slam Israel’s halt in visa renewals for aid workers in Gaza and West Bank”, *Associated Press* (8 March 2024), <https://apnews.com/article/israel-gaza-war-hamas-humanitarian-visas-5d306d367e6522495a4ee8045859a3b8>; and Emma Graham-Harrison, “Humanitarian workers face deportation from Israel after freeze on visas”, *The Guardian* (29 February 2024), <https://www.theguardian.com/world/2024/feb/29/humanitarian-workers-face-deportation-from-israel-after-freeze-on-visas>.

²⁰⁹ Tamara Qiblawi *et al.*, “Anesthetics, crutches, dates. Inside Israel’s ghost list of items arbitrarily denied entry into Gaza”, *CNN World* (2 March 2024), <https://edition.cnn.com/2024/03/01/middleeast/gaza-aid-israel-restrictions-investigation-intl-cmd/index.html>. See also UNGA, *Report of the Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel*, A/79/232 (11 September 2024), <https://undocs.org/A/79/232>, para. 31.

²¹⁰ Philippe Lazzarini, @UNLazzarini, Tweet (7:07 pm, 11 March 2024), <https://twitter.com/UNLazzarini/status/1767250887234261005>. See also Oxfam, *Inflicting unprecedented suffering and destruction* (15 March 2024), <https://policy-practice.oxfam.org/resources/inflicting-unprecedented-suffering-and-destruction-seven-ways-the-government-of-621591/>, p. 8.

wheelchairs, water pumps, ultrasound equipment, generators for hospitals, and life-saving medical equipment.²¹¹

50. ***Israel's control over the entry of humanitarian aid:*** Israel has demonstrated that it has the capacity to rapidly increase the entry of aid — should it *choose* to. For instance, Israel failed to scale up aid in response to the repeated warnings of famine issued by the international community,²¹² including in the ICJ's provisional measures Orders.²¹³ Only after widespread outrage from Israel's allies following Israel's killing of seven international humanitarian aid workers on 1 April 2024,²¹⁴ did Israel open the first crossing into northern Gaza since October 2023. In the following months of April and May 2024, Israel facilitated the entry of predominantly commercial food aid into northern Gaza.²¹⁵ This demonstrates Israel's capacity to act rapidly to address an emergency situation — but only if it chooses to do so. The scaling up of humanitarian aid since the ceasefire also clearly evidences Israel's capacity to increase aid as it pleases.²¹⁶ Its failure to do so consistently, leaves no other reasonable inference but that it intends to create and maintain genocidal conditions of life of Palestinians in Gaza.
51. ***Israel's denial of aid through the creation of a hostile environment for distribution:*** According to the United Nations Secretary-General, “the way Israel is conducting this offensive is creating massive obstacles to the distribution of humanitarian aid inside Gaza.”²¹⁷ Once aid has entered through a crossing, military operations in Gaza continue to impede and destabilise the distribution of aid by attacking aid and destroying road infrastructure.²¹⁸ For example, in March 2024, 85 per cent of food missions were denied, impeded, postponed or withdrawn, and all four medical missions to Al Shifa hospital were denied or impeded (100 per cent denied or impeded).²¹⁹ Between 7 October 2023 and 16 September 2024, Forensic Architecture recorded 322 incidents of Israel targeting aid operations that included attacks on aid seekers, aid workers, aid convoys, markets, aid infrastructure and storage facilities,

²¹¹ Association of International Development Agencies, *Snapshot of Deprivation of Humanitarian Aid in the Gaza Strip since January 2024* (20 February 2024), <https://aidajerusalem.org/download/snapshot-of-deprivation-of-humanitarian-aid-in-the-gaza-strip/>, p. 2; UNFPA, @UNFPA, Tweet (8:11 pm, 11 April 2024) <https://twitter.com/UNFPA/status/1778485928819855805>; Niha Masih, “Crutches and chocolate croissants: Gaza aid items Israel has rejected”, *The Washington Post* (11 April 2024), <https://www.washingtonpost.com/world/2024/04/11/israel-aid-gaza-banned-blocked/>; and Medecins Sans Frontieres (‘MSF’), *What it takes to get lifesaving supplies into Gaza* (1 May 2024), <https://www.doctorswithoutborders.org/latest/impossible-task-getting-lifesaving-supplies-gaza>.

²¹² For the warnings, see for example Integrated Food Security Phase Classification, *Gaza Strip: Acute Food Insecurity Situation for 24 November – 7 December 2023 and Projection for 8 December 2023 – 7 February 2024* (21 December 2023), <https://www.ipcinfo.org/ipc-country-analysis/details-map/en/c/1156749/?iso3=PSE>; Famine Early Warning Systems Network, *Famine (IPC Phase 5) is imminent in northern Gaza, likely by May* (18 March 2024), https://fews.net/sites/default/files/2024-03/Gaza%20Targeted-Analysis-03182024-Final_0.pdf. For a classification of famines, see Integrated Food Security Phase Classification, *IPC Guidance Note: Famine Classification*, https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC-Guidance-Note-on-Famine.pdf.

²¹³ *South Africa v. Israel*, Provisional Measures Order of 26 January 2024, pp. 16-17, 24, paras. 47, 49, 86; *South Africa v. Israel*, Provisional Measures, Order of 28 March 2024, p. 12, para. 51.

²¹⁴ The White House, *Statement from President Joe Biden on the Death of World Central Kitchen Workers in Gaza* (2 April 2024), <https://www.whitehouse.gov/briefing-room/statements-releases/2024/04/02/statement-from-president-joe-biden-on-the-death-of-world-central-kitchen-workers-in-gaza/>.

²¹⁵ FEWS NET, *Gaza Strip Food Supply Report: Gaza food supply assessment, as of July 31, 2024* (31 July 2024), <https://fews.net/middle-east-and-asia/gaza/special-report-july-2024>.

²¹⁶ UN OCHA, *Humanitarian Situation Update #259 | Gaza Strip* (28 January 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-259-gaza-strip>; Michelle Nichols, “UN says 915 aid trucks entered Gaza on Monday”, *Reuters* (21 January 2025), <https://www.reuters.com/world/middle-east/un-says-915-aid-trucks-entered-gaza-monday-2025-01-20/>.

²¹⁷ UN OCHA, Remarks to the media by the Secretary-General (22 December 2023), <https://www.ochaopt.org/content/remarks-media-secretary-general>, as cited in *South Africa v. Israel*, Application of 29 December 2023, p. 41, para. 62.

²¹⁸ Forensic Architecture, *A Spatial Analysis of the Israeli Military's Conduct in Gaza since October 2023* (15 October 2024), Chapter 6: Destruction of Civilian Infrastructure, p. 579. See also, Chapter 8: Cross-Sectional Analysis, p. 811, fig. 8.25.

²¹⁹ UN OCHA, *Humanitarian Access Snapshot — Gaza Strip | 1-31 March 2024* (6 April 2024), <https://www.unocha.org/publications/report/occupied-palestinian-territory/humanitarian-access-snapshot-gaza-strip-1-31-march-2024>.

and shelters housing displaced Palestinians.²²⁰ At least 17 of these incidents occurred where an area concerning aid operations was specifically deconflicted — meaning it is designated as safe from military targeting by Israel.²²¹ Tellingly, Forensic Architecture’s analysis finds that where specific sites and systems of aid distribution became the main mode of aid distribution in Gaza, Israel’s military operation would overwhelmingly target those sites.²²²

52. ***The failure to restrain and hold to account those obstructing aid:*** Israel has failed to restrain and hold to account those seeking to obstruct the entry and distribution of aid. For example, in the months of January and February 2024, Israeli protesters prevented the entry of aid trucks at Kerem Shalom on several occasions, for instance, blocking around 130 trucks from entering on one occasion;²²³ 51 trucks out of 60 on another.²²⁴ Israeli protesters also protested the entry of aid trucks through Nitzana,²²⁵ resulting in aid trucks turning back,²²⁶ despite the area around that crossing also being declared a restricted military zone.²²⁷ The protests against life-saving aid also extended to Ashdod Port.²²⁸ In March 2024, Israeli officials were reported to have “tipped off” protesters about the location of aid trucks, facilitating their interception.²²⁹ Israel has failed to put in place effective measures to prevent protesters from blocking the entry of aid and ensuring the safety and security of aid convoys, or taken credible steps to hold these protesters to account. In June 2024, reports emerged of the Israeli National Security Minister Itamar Ben-Gvir directly instructing the Deputy Commissioner of Police to *refrain* from providing security to aid convoys,²³⁰ further enabling protesters to block aid with impunity. Moreover, Israeli parliamentarians have not only praised,²³¹ but participated in these protests²³²

²²⁰ Forensic Architecture, *A Spatial Analysis of the Israeli Military’s Conduct in Gaza since October 2023* (15 October 2024) Chapter 7: Targeting of aid, pp. 720-784.

²²¹ *Ibid.*

²²² Forensic Architecture, *A Spatial Analysis of the Israeli Military’s Conduct in Gaza since October 2023* (15 October 2024) Chapter 7, Targeting of aid, p. 723.

²²³ “*Le mouvement Tsav 9: un blocus citoyen contre le Hamas*”, *Tandem TV* (10 February 2024), <https://www.youtube.com/watch?v=96Hgrkh2CA> [22:35] – [22:39]. See also, Shilo Farid, “Hundreds of tents on the road: Kerem Shalom crossing blocked since last night”, *Makor Rishon* (7 February 2024) <https://www.makorrishon.co.il/news/731035/>.

²²⁴ Shirir Avitan Cohen and Ilya Egorov, “For a second day in a row: The Kerem Shalom crossing was blocked again for the passage of supply and aid convoys to the Gaza Strip”, *Israel Hayom* (25 January 2024), <https://www.israelhayom.co.il/news/local/article/15162871>; Interview with Chairperson of Tsav 9: “Hundreds blocked trucks on their way to Gaza: ‘Humanitarian aid is killing our soldiers’”, *Channel 14* (24 January 2024), [00:27] – [00:45], [02:02] <https://www.youtube.com/watch?v=V2-7JNmV96U>.

²²⁵ “Dozens of Israelis protest near border crossing against delivering aid into Gaza”, *AP Archive* (7 February 2024), <https://www.youtube.com/watch?v=SqfX7ueqycY>; and Sheila Farid, “The struggle against the aid to Hamas continues: Nitzana Crossing blocked, trucks left outside”, *Makor Rishon* (27 February 2024), <https://www.makorrishon.co.il/news/739251/>.

²²⁶ “Nitzana Crossing was also blocked: The aid trucks returned to Egypt”, *Hadshot Srugim* (30 January 2024), <https://www.srugim.co.il/891218-גם-מעבר-ניצנה-נחסם-משאיות-הסיוע-חזרו-למ-891218>.

²²⁷ “IDF declares Egypt crossing a closed military zone”, *Israel National News* (31 January 2024), <https://www.israelnationalnews.com/news/384465>.

²²⁸ ToI Staff and Emanuel Fabian, “Activists block Gaza aid trucks at Ashdod Port after being barred from border by IDF”, *The Times of Israel* (1 February 2024), <https://www.timesofisrael.com/activists-block-gaza-aid-trucks-at-ashdod-port-after-being-barred-from-border-by-idf/>.

²²⁹ Lorenzo Tondo and Quique Kierszenbaum, “Israeli soldiers and police tipping off groups that attack Gaza aid trucks”, *The Guardian* (21 May 2024), <https://www.theguardian.com/world/article/2024/may/21/israeli-soldiers-and-police-tipping-off-groups-that-attack-gaza-aid-trucks>.

²³⁰ Gilad Morag and Meir Turjeman, “The Police Commissioner to the Attorney General: Ben Gvir instructed my deputy not to provide security for aid convoys, and threatened ‘consequences’ when I refused”, *Ynet* (13 June 2024), <https://www.ynet.co.il/news/article/hj6opjuba>.

²³¹ See, for example: Revital Gotliv, @TallyGotliv, Tweet (2:30 pm, 31 January 2024), <https://twitter.com/TallyGotliv/status/1752670702858072329>.

²³² ToI Staff and Emanuel Fabian, “Activists block Gaza aid trucks at Ashdod Port after being barred from border by IDF”, *The Times of Israel* (1 February 2024), <https://www.timesofisrael.com/activists-block-gaza-aid-trucks-at-ashdod-port-after-being-barred-from-border-by-idf/>.

held by Israeli civilians to block the delivery of life-saving humanitarian aid to the starving population of Gaza.²³³

53. ***The denial of aid through its campaign to end UNRWA's operations:*** Israel's pattern of denial of humanitarian aid is starkly demonstrated by its campaign to undermine, attack, and ultimately end UNRWA's operations. UNRWA is the "largest humanitarian organisation on the ground in Gaza",²³⁴ and, as humanitarian groups on the ground have underscored, "[t]he plain reality is that UNRWA's humanitarian role in this crisis is indispensable . . . and cannot remotely be replaced by any other aid organization."²³⁵ As such, to seek to destroy UNRWA is to destroy the very possibility of the effective provision of humanitarian assistance to Palestinians in Gaza,²³⁶ particularly at a time when Gaza is facing the worst humanitarian crisis seen in the world for more than 50 years.²³⁷ Israel's attacks on UNRWA have taken the form of sustained attacks on UNRWA personnel, facilities, shelters and operations,²³⁸ destroying nearly 70 per cent of UNRWA's schools-turned-shelters for displaced Palestinians.²³⁹ They have also manifested in the form of a "deliberate and concerted" insidious "campaign" aiming to "undermine [UNRWA's] operations, and ultimately end them",²⁴⁰ including by (i) imposing blanket restrictions on UNRWA's aid operations;²⁴¹ (ii) complete denials of UNRWA's repeated requests for access to the north of Gaza over a period of several months despite escalating conditions of starvation and reports of famine setting in;²⁴² (iii) the detention of UNRWA personnel and their torture by Israeli authorities as well as the attempted extraction of forced confessions;²⁴³ (iv) blocking and evicting staff from UNRWA premises,²⁴⁴ (v) militarily occupying UNRWA premises;²⁴⁵ (vi) preventing the Commissioner-

²³³ "Israeli activists block aid trucks from entering Gaza", *Middle East Eye* (8 February 2024), <https://www.youtube.com/shorts/pS7SGFnAmRk>; Igal Malka, @igal_malka_5G, Tweet (2:19 pm, 6 February 2024), https://twitter.com/igal_malka_5G/status/1754842129619108068; Loveday Morris, Hazem Balousha and Karen DeYoung, "Gaza aid delivery hampered by Israeli attacks on police, rising chaos", *The Washington Post* (22 February 2024), <https://www.washingtonpost.com/world/2024/02/22/gaza-aid-deliveries-looting-police-hamas/>.

²³⁴ UN News, *UNRWA seeks \$1.2 billion to meet urgent needs in Gaza and the West Bank* (24 April 2024), <https://news.un.org/en/story/2024/04/1148931>.

²³⁵ UNRWA, *Joint NGO Statement: EU and Member States Must Sustain Funding to UNRWA* (29 February 2024), <https://www.unrwa.org/newsroom/official-statements/joint-ngo-statement-eu-and-member-states-must-sustain-funding-unrwa>.

²³⁶ UN, *UN Humanitarian Chief Martin Griffiths Calls for Immediate Ceasefire and Humanitarian Access in Gaza Crisis – Briefing to the Security Council on the Situation in the Middle East, Including the Palestinian Question* (31 January 2024), <https://www.un.org/unispal/document/ocha-statement-security-council-31jan-2024>; UN News, *Gaza: Aid cuts to UN agency could be felt in weeks* (30 January 2024), <https://news.un.org/en/story/2024/01/1146047>.

²³⁷ Adam Arnold, "'Gaza is worst humanitarian crisis I have seen in 50 years', top UN official says", *Sky News* (14 February 2024), <https://news.sky.com/story/gaza-is-worst-humanitarian-crisis-i-have-seen-in-50-years-top-un-official-tells-sky-news-13071666>.

²³⁸ Forensic Architecture, *A Spatial Analysis of the Israeli Military's Conduct in Gaza since October 2023* (15 October 2024), Chapter 6, *Destruction of Civilian Infrastructure* pp. 609-616.

²³⁹ UNRWA, *Education under attack* (9 September 2024), <https://www.unrwa.org/newsroom/photos/education-under-attack>, p. 3.

²⁴⁰ UNRWA, *Statement of the Commissioner-General of UNRWA to the General Assembly* (4 March 2024), <https://www.unrwa.org/newsroom/official-statements/statement-commissioner-general-unrwa-general-assembly>; See also Hanin Abou Salem, "Why is Netanyahu trying to disband the UNRWA?", *Reuters* (22 June 2017), <https://www.aljazeera.com/opinions/2017/6/22/why-is-netanyahu-trying-to-disband-the-unrwa>; David Isaac, "Israel wants UNRWA out of Gaza", *Jewish News Syndicate* (31 December 2023), <https://www.jns.org/israel-wants-unrwa-out-of-gaza/>.

²⁴¹ UNRWA, *UNRWA Situation Report #95 on the situation in the Gaza Strip and the West Bank, including East Jerusalem* (27 March 2024), <https://www.unrwa.org/resources/reports/unrwa-situation-report-95-situation-gaza-strip-and-west-bank-including-east-jerusalem>.

²⁴² *Ibid.*

²⁴³ UNRWA, *UNRWA Situation Report #102 on the situation in the Gaza Strip and the West Bank, including East Jerusalem* (19 April 2024), <https://www.unrwa.org/resources/reports/unrwa-situation-report-102-situation-gaza-strip-and-west-bank-including-east-jerusalem>; UNRWA, *Detention and alleged ill-treatment of detainees from Gaza during Israel-Hamas War* (16 April 2024), <https://www.unrwa.org/resources/reports/detention-and-alleged-ill-treatment-detainees-gaza-during-israel-hamas-war>.

²⁴⁴ UN News, *Global Perspective Human Stories, General Assembly President condemns 'catastrophic, unconscionable, shameful' conditions in Gaza* (4 March 2024), <https://news.un.org/en/story/2024/03/1147202>.

²⁴⁵ UNRWA, *Statement by the Commissioner-General of UNRWA to the Security Council* (17 April 2024), <https://www.unrwa.org/newsroom/official-statements/statement-commissioner-general-unrwa-security-council>.

General of UNRWA from entering Gaza to coordinate humanitarian aid amidst unfolding famine,²⁴⁶ and (vii) failing to renew visas for key UNRWA staff.²⁴⁷ As highlighted in Section II, the most recent phase of Israel's long-standing campaign to dismantle UNRWA is the passing of legislation by the Israeli Knesset to target and close UNRWA, to strip UNRWA personnel of the privileges and immunities that they currently have by virtue of being United Nations personnel, and to label UNRWA a terrorist organisation on the purported basis of the above unsubstantiated allegations of their staff's involvement in the events of 7 October 2023.²⁴⁸

54. This pattern demonstrates that Israel has implemented a number of practices and policies: (i) Israel's denial of humanitarian aid beginning with the deliberate rendering of the population dependent on external assistance and thus subject to Israel's will; (ii) subsequently the denial of entry of humanitarian aid through the closure of land crossings and arbitrary inspection protocols; (iii) the creation of a hostile environment for aid distribution including through military attacks on aid; (iv) multifaceted attacks on UNRWA, its personnel and operations; (v) Israel's policy of starvation and malnutrition, further weakening the population; (vi) allowing, aiding and abetting third parties' interference with the delivery of aid. These practices and policies pursue the common purpose of rendering the population ever more vulnerable and susceptible to death or harm as well as to deny members of the group the most basic necessities for survival. Such conduct cumulatively evidences Israel's genocidal intent.

C: The pattern of Israel creating unbearable living conditions for the Palestinian population of Gaza

55. Israel has pursued a multifaceted policy of creating inhumane and unbearable living conditions for Palestinians in Gaza, achieved through a variety of policies and practices, all of them directed at destroying the protected group. The conditions of life in Gaza have been variously described by the United Nations and aid agencies as "beyond catastrophic",²⁴⁹ "a living nightmare",²⁵⁰ "a living hell",²⁵¹ "inhumane",²⁵² a "humanitarian disaster",²⁵³ "a crisis unlike anything we have ever seen before",²⁵⁴ and "beyond unbearable".²⁵⁵ These conditions did not accidentally arise, nor are they by-

²⁴⁶ Philippe Lazzarini, @UNLazzarini, Tweet (3:05 pm, 18 March 2024),

<https://twitter.com/UNLazzarini/status/1769711761136009310?lang=en>; Josep Borrell Fontelles, @JosepBorrellF, Tweet (1:09 pm, 20 March 2024), <https://twitter.com/JosepBorrellF/status/1770407223212036215>.

²⁴⁷ Patrick Wintour, "Israel seeking to close down Unrwa, says agency's chief after school bombing", *The Guardian* (13 September 2024), <https://www.theguardian.com/world/2024/sep/13/israel-seeking-to-close-down-unrwa-philippe-lazzarini-school-bombing>.

²⁴⁸ UN News, Global Perspective Human Stories, *Israel: New law blocking UNRWA 'would be a catastrophe', Guterres warns* (8 October 2024), <https://news.un.org/en/story/2024/10/1155471>.

²⁴⁹ CARE International and others, Leading Canadian humanitarian organizations mark one month of violence in Gaza, Israel and the West Bank; call for immediate ceasefire and humanitarian access (7 November 2023), <https://reliefweb.int/report/occupied-palestinian-territory/leading-canadian-humanitarian-organizations-mark-one-month-violence-gaza-israel-and-west-bank-call-immediate-ceasefire-and-humanitarian-access>.

²⁵⁰ UN OHCHR, *UN Human Rights Chief visits Rafah border crossing with Gaza* (8 November 2023), <https://reliefweb.int/report/occupied-palestinian-territory/un-human-rights-chief-visits-rafah-border-crossing-gaza-enar>.

²⁵¹ UN OHCHR, *Gaza: Türk urges ceasefire as civilians pushed to frontier amid escalation* (19 December 2023), <https://reliefweb.int/report/occupied-palestinian-territory/gaza-turk-urges-ceasefire-civilians-pushed-frontier-amid-escalation-enar>.

²⁵² UNRWA, *The Gaza Strip: 100 days of death, destruction and displacement* (13 January 2024), <https://reliefweb.int/report/occupied-palestinian-territory/gaza-strip-100-days-death-destruction-and-displacement-enar>.

²⁵³ ICRC, *Israel and the Occupied Territories: The ICRC urges protection for Gaza civilians evacuating and staying behind* (12 November 2023), <https://reliefweb.int/report/occupied-palestinian-territory/israel-and-occupied-territories-icrc-urges-protection-gaza-civilians-evacuating-and-staying-behind-enar>.

²⁵⁴ CARE International, *Five months of war in Gaza: "Two mothers have died every hour"* (6 March 2024), <https://reliefweb.int/report/occupied-palestinian-territory/five-months-war-gaza-two-mothers-have-died-every-hour>.

²⁵⁵ UN News, *Gaza war grinds on as forcibly displaced run out of space to shelter* (1 July 2024), <https://reliefweb.int/report/occupied-palestinian-territory/gaza-war-grinds-forcibly-displaced-run-out-space-shelter>.

products of an ongoing conflict. They were *deliberately* inflicted through Israel's cross-cutting patterns of conduct set out in this Annex,²⁵⁶ and leave no doubt that they have been calculated to bring about the destruction of Palestinians as a group through measures of slow death.

56. As discussed below, Israel has systematically and repeatedly displaced 85 per cent of the population of Gaza at short notice — first from their homes and then from wherever they have sought refuge — at short notice, into small and smaller designated “safe zones.” These zones have then been deliberately targeted by Israel, which has resulted in desperate, vulnerable and starving Palestinians being constantly on the move. This has rendered it impossible for displaced Palestinians to have reliable access to basic services, medical necessities, and life-saving humanitarian assistance — which are constantly targeted and displaced to different locations as a result of the same evacuation orders and had to be re-established, having to set up operations again and again. This displacement has been carried out in a manner which denies the Palestinian people the resources needed for their survival, bringing about their destruction through slow death — both en route to so-called safe zones as well as through the infliction of unbearable conditions in such “safe” zones. Israel has taken no credible steps to ensure that those displaced have adequate means of sustenance during their displacement. Shelters are overcrowded, exposed to the elements, and are often makeshift structures. There is little to no sanitation, with mountains of waste in and around their vicinity, and very limited access to running water and toilets. This has led to a public health catastrophe: preventable and infectious diseases have spread like wildfire in these unhygienic conditions, affecting the most vulnerable. Israel has deliberately inflicted these conditions of life upon Palestinians.²⁵⁷
57. Israel has deliberately denied Palestinians in Gaza electricity and fuel, and destroyed the means for providing electricity (including generators and solar panels). This has affected every aspect of life in Gaza and crippled humanitarian operations and the provision of basic services. The last remaining mills and bakeries and the fishing industry are unable to operate due to the lack of fuel.²⁵⁸ Hospitals are entirely dependent on fuel and electricity to provide life-saving medical assistance. Israel's throttling of fuel has led to a severe reduction in the functioning of hospitals, leading to preventable deaths and serious harm being caused to the most vulnerable members of society including neonates and those who are critically injured.²⁵⁹ Communications networks are also affected by the lack of fuel leading to difficulties in coordinating aid operations and placing Palestinians' lives at literal risk as they are unable to access the most updated information on evacuations without communications networks.²⁶⁰
58. Israel has furthermore engaged in a deliberate campaign of starvation, by throttling access to food and water, attacking desperate Palestinians seeking lifesaving food aid to survive, and destroying agricultural land and infrastructure indispensable to survival by turning farmland into dust, resulting in the collapse of Gaza's food resources for both the present and the future. These measures of slow death have taken effect, with irreversible diseases and deaths from malnutrition and dehydration being reported and the onset of famine. This has affected vulnerable groups — in particular pregnant women, children, people with pre-existing conditions, and people with disabilities.

²⁵⁶ See also Forensic Architecture, *A Spatial Analysis of the Israeli Military's Conduct in Gaza since October 2023* (15 October 2024), (Chapter 8: Cross Sectional Analysis), p. 785.

²⁵⁷ *Ibid.*

²⁵⁸ *Ibid.*, p. 776.

²⁵⁹ *Ibid.*, p. 343.

²⁶⁰ *Ibid.*

59. Finally, Israel has deliberately deprived hungry, exhausted, injured and sick Palestinians of access to medical assistance, and decimated the healthcare system in Palestine. Israel has attacked and destroyed hospitals, health care clinics and ambulances; destroyed medical equipment; targeted, killed, injured and detained doctors, health care workers and patients; created sanitation issues including the leakage of sewage water; restricted and prevented the entry of fuel, electricity, medical equipment, essential medicines and humanitarian goods into Gaza; prevented aid workers and healthcare missions from accessing persons in critical need; and refused the evacuation of persons in critical need. Additionally, Israel has repeatedly ordered the evacuation of health care facilities forcing critically ill and injured Palestinians away from life-saving medical facilities without making any provision for continued safety or health care. Israel's destruction of the healthcare system in Gaza, arbitrary detention and torture of healthcare workers, and attacks on hospitals provide evidence of a calculated policy on the part of Israel to destroy the institutions that protect and save Palestinian lives.

D: The pattern of Israel targeting those trying to help and protect Palestinians, including medical and humanitarian personnel

60. Israel has further targeted the people and institutions whose mandate is to help and protect Palestinians. Humanitarian personnel (including United Nations personnel), health workers (including doctors and other medical personnel), and journalists (including their activities, facilities, vehicles, and property) have all come under targeted and sustained attack.²⁶¹ The scale of Israel's killing of those seeking to help and protect the Palestinians is unprecedented.²⁶² During Israel's total siege and assault on Gaza, "more journalists, more medical personnel, and more United Nations staff have been killed than anywhere in the world during a conflict."²⁶³ Even when compared with past genocides, this constitutes a rare, but not unique, feature of Israel's genocidal endeavour. Atrocities committed against helpers are not isolated or accidental. Israel's assault on Gaza has shown a "pattern of deliberate attacks on humanitarians, health workers, journalists, United Nations' personnel, schools and homes."²⁶⁴ Israel's targeting of those trying to help and protect Palestinians includes the following:
61. **Attacks on humanitarian personnel and objects:** There is repeated, overlapping, and overwhelming evidence that Israel has systematically attacked humanitarian personnel (aid workers), infrastructure and aid convoys, thus preventing life-saving aid from reaching Palestinians in Gaza. Only two-and-a-half months into Israel's siege and attack on Gaza, already 144 United Nations employees were killed, the "highest number of aid workers killed in UN history in such a short time."²⁶⁵ Similarly, the United Nations Commission of Inquiry has found that "[t]hese attacks have resulted in an *unprecedented death toll* among United Nations staff and other

²⁶¹ UN OCHA, *Reported impact snapshot | Gaza Strip (26 June 2024)* (26 June 2024), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-26-june-2024>, (noting: By the end of June 2024, 274 aid workers were killed (including 197 UN staff); 500 health workers were killed; and 152 journalists and media workers were killed.). The numbers killed since then have only increased. For instance, by 21 August 2024, 289 aid workers were killed (including 211 UN staff); 885 health workers were killed; and 170 journalists and media workers were killed. UN OCHA, *Reported impact snapshot | Gaza Strip* (21 August 2024), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-21-august-2024>.

²⁶² UNRWA, *Statement of the Commissioner-General of UNRWA to the General Assembly* (4 March 2024), <https://www.unrwa.org/newsroom/official-statements/statement-commissioner-general-unrwa-general-assembly>.

²⁶³ *Ibid.*

²⁶⁴ Christopher Lockyear, @Chris_lockyear, Tweet (10:53 pm, 4 April 2024), https://twitter.com/Chris_lockyear/status/1775990033666781379.

²⁶⁵ UN OCHA, *Hostilities in the Gaza Strip and Israel - reported impact | Day 82* (27 December 2023), <https://www.ochaopt.org/content/hostilities-gaza-strip-and-israel-reported-impact-day-82>; UN News, *UN honours 101 staff killed in Gaza conflict* (13 November 2023), <https://news.un.org/en/story/2023/11/1143512>.

humanitarian personnel operating in the territory.”²⁶⁶ Israel’s killing of humanitarian personnel in Gaza exceeded the total number “killed in the entire world in any year in the past two decades.”²⁶⁷ In respect of UNRWA alone, by the end of July 2024, 199 staff members were killed.²⁶⁸ This is the highest staff death toll in United Nations history.²⁶⁹ Similarly, by the end of June 2024, 33 Palestinian Red Crescent Society (‘PRCS’) staff members had been killed since Israel’s attack on Gaza,²⁷⁰ of which, 19 had been killed by Israeli forces “while performing their humanitarian duties”.²⁷¹ Moreover, by 26 June 2024, 70 civil defence staff had also been killed while on duty in Gaza.²⁷² Between 7 October 2023 and June 2024, Israeli attacks have led to one 188 different UNRWA installations being damaged; with at least 520 displaced Palestinians being killed and 1,595 injured while sheltering in UNRWA shelters.²⁷³ Similarly, attacks on aid convoys have occurred even when the aid convoy routes have been coordinated with the Israeli authorities.²⁷⁴ The attacks on humanitarian infrastructure are targeted and strategic, not merely incidental or unintentional, as

²⁶⁶ UN HRC, *Detailed findings on the military operations and attacks carried out in the Occupied Palestinian Territory from 7 October to 31 December 2023*, A/HRC/56/CRP.4 (10 June 2024), <https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session56/a-hrc-56-crp-4.pdf>, para. 230 (emphasis added); See also, paras. 230–239.

²⁶⁷ Sophia Dawkins and Michael Spagat, “Gaza’s invisible massacre: aid workers killed in record numbers” *Action on Armed Violence* (15 May 2024), <https://aoav.org.uk/2024/gazas-invisible-massacre-aid-workers-killed-in-record-numbers/>; “The war in Gaza has no 21st-century precedent that can approach the sheer carnage it has brought on humanitarians. More than 200 aid workers have been killed in seven months — exceeding the total number killed in the entire world in any year in the past two decades.” Relying, for this comparison, on open-source data collected and available at <https://www.aidworkersecurity.org/incidents> - Data underlying article available at <https://pure.royalholloway.ac.uk/en/projects/the-death-toll-in-the-gaza-war>.

²⁶⁸ UNRWA, *Briefing to the United Nations Security Council by UNRWA Deputy Commissioner General, Ms. Antonia De Meo* (26 July 2024), <https://www.unrwa.org/newsroom/official-statements/unrwa-briefing-security-council>.

²⁶⁹ UN News, *UN honours 101 staff killed in Gaza conflict* (13 November 2023), <https://news.un.org/en/story/2023/11/1143512>.

²⁷⁰ UN OCHA, *Reported impact snapshot | Gaza Strip* (26 June 2024), (26 June 2024), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-26-june-2024>; See also, PRCS, *Statement issued by the Palestine Red Crescent Society (PRCS) regarding the killing of two paramedics in Rafah* (30 May 2024), [https://www.palestinercs.org/en/Article/11904/Statement-issued-by-the-Palestine-Red-Crescent-Society-\(PRCS\)-regarding-the-killing-of-two-paramedics-in-Rafah](https://www.palestinercs.org/en/Article/11904/Statement-issued-by-the-Palestine-Red-Crescent-Society-(PRCS)-regarding-the-killing-of-two-paramedics-in-Rafah); PRCS, @PalestineRCS, Tweet (9:23 am, 1 June 2024), <https://twitter.com/PalestineRCS/status/1796804827806093498>.

²⁷¹ UN OCHA, *Reported impact snapshot | Gaza Strip* (26 June 2024) (26 June 2024), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-26-june-2024>; PRCS, *Statement issued by the Palestine Red Crescent Society (PRCS) regarding the killing of two paramedics in Rafah* (30 May 2024), [https://www.palestinercs.org/en/Article/11904/Statement-issued-by-the-Palestine-Red-Crescent-Society-\(PRCS\)-regarding-the-killing-of-two-paramedics-in-Rafah](https://www.palestinercs.org/en/Article/11904/Statement-issued-by-the-Palestine-Red-Crescent-Society-(PRCS)-regarding-the-killing-of-two-paramedics-in-Rafah); PRCS, @PalestineRCS, Tweet (9:23 am, 1 June 2024), <https://twitter.com/PalestineRCS/status/1796804827806093498>; UNGA, *Report of the Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel*, A/79/232, (11 September 2024), <https://documents.un.org/doc/undoc/gen/n24/262/79/pdf/n2426279.pdf>, paras. 11 and 95. The COI finds that Israeli military had wilfully killed two PRCS paramedics and attacked a PRCS ambulance seeking to rescue children who, together with their family (7 in total), the Israeli military had attacked and ultimately killed. For analysis of same incident see Forensic Architecture, *The Killing of Hind Rajab*, <https://forensic-architecture.org/investigation/the-killing-of-hind-rajab>; See also PRCS, *Violations against PRCS Medical Missions since October 7th, 2023 in the Gaza Strip* (October 2023 – August 2024), https://www.palestinercs.org/public/files/image/2024/Reports/Violations%20Against%20PRCS%20Medical%20Missions_Gaza.pdf.

²⁷² UN OCHA, *Reported impact snapshot | Gaza Strip* (26 June 2024), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-26-june-2024>. A day later, on 27 June 2024, the Palestinian Civil Defence reported that three more staff members were killed in the line of duty and several other people were injured in an Israeli airstrike in Al Bureij. See UN OCHA, *Humanitarian Situation Update #184 | Gaza Strip* (28 June 2024), <https://www.ochaopt.org/content/humanitarian-situation-update-184-gaza-strip>.

²⁷³ UNRWA, *UNRWA Situation Report #116 on the situation in the Gaza Strip and the West Bank, including East Jerusalem* (28 June 2024), <https://www.unrwa.org/resources/reports/unrwa-situation-report-116-situation-gaza-strip-and-west-bank-including-east-jerusalem>. See also, UN OCHA, *Reported impact snapshot | Gaza Strip* (26 June 2024) (26 June 2024), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-26-june-2024>. See Forensic Architecture, *A Spatial Analysis of the Israeli Military’s Conduct in Gaza since October 2023* Chapter 7: Targeting of Aid (15 October 2024), p. 770, para. 122 (“The Israeli military repeatedly targeted UNRWA infrastructure, lodging, vehicles, and personnel while they were facilitating the distribution of aid. The targets included sites whose coordinates were shared with Israeli authorities and ‘deconflicted’ in order to exempt them from military targeting.”)

²⁷⁴ Philippe Lazzarini, @UNLazzarini, Tweet (4:24 pm, 5 February 2024), <https://twitter.com/UNLazzarini/status/1754511426406744518>; Katie Polgase and Muhammad Darwish, “Exclusive: Israeli forces fired on food convoy in Gaza, UN documents and satellite analysis reveals”, *CNN* (21 February 2024), <https://edition.cnn.com/2024/02/21/middleeast/un-food-convoy-gaza-israel-strike-cmd-intl/index.html>.

clearly established by the number of incidents, victims, locations, and modus operandi.²⁷⁵ Forensic Architecture has identified a non-exhaustive list of 313 incidents of “aid-targeting” by Israel, between 7 October 2023 and 16 September 2024,²⁷⁶ which include the following:²⁷⁷ (a) 50 attacks on civilians seeking aid; (b) 72 attacks on shelters for displaced Palestinians; (c) 77 attacks on aid infrastructure; (d) 52 attacks on aid personnel (which include all those who assisted with aid distribution); (e) 23 attacks on convoys of trucks transporting aid through Gaza, despite being coordinated with Israel by humanitarian aid organisations; and (f) at least 17 of the attacks on aid personnel, convoys, and infrastructure targeted sites involved in operations that had been officially coordinated with Israel as “deconflicted sites”. Humanitarian personnel have also been harassed, “detained by Israeli security forces, and subsequently reported mistreatment and even torture.”²⁷⁸ For these reasons, it is evident that the attacking, killing and injuring of humanitarian workers and targeting of vital aid infrastructure and property have been designed and calculated to form part of a broader policy ultimately directed at the protected group.²⁷⁹ This conduct is also part of a broader strategy of denying aid to Palestinians in Gaza as part of its campaign of starvation.

62. **Attacks on health workers including doctors and other medical personnel:** Health workers (including doctors and other medical personnel) and facilities have been attacked, detained and tortured by the Israeli military in flagrant violation of international law and in direct contravention of the ICJ’s Orders.²⁸⁰ As of 19 November 2024, 1,047 health workers had been killed by Israel in Gaza.²⁸¹ This rate of killing represents an average of two health workers being killed *every day*.²⁸² Since October 2023, more healthcare workers have been killed in Gaza than the total reported killings

²⁷⁵ Forensic Architecture, *A Spatial Analysis of the Israeli Military’s Conduct in Gaza since October 2023* (15 October 2024), Chapter 7: Targeting of Aid (15 October 2024), pp. 720–778.

²⁷⁶ Forensic Architecture, *A Spatial Analysis of the Israeli Military’s Conduct in Gaza since October 2023*, Chapter 7: Targeting Aid (15 October 2024), p. 722 (Quantitative findings, para. 1.1)

²⁷⁷ Ibid, p. 722 (Quantitative findings, para. 1.1).

²⁷⁸ UN, Meetings Coverage and Press Releases, *As Civilians in Gaza are Pushed into ‘Ever Deeper Circles of Hell’, Donors Must Act Not to Protect UN Palestine Refugee Agency, Secretary-General Urges Pledging Conference* (12 July 2024), <https://press.un.org/en/2024/sgsm22306.doc.htm>.

²⁷⁹ See also, UNRWA, *UNRWA Situation Report #104 on the situation in the Gaza Strip and the West Bank, including East Jerusalem* (26 April 2024), <https://www.unrwa.org/resources/reports/unrwa-situation-report-104-situation-gaza-strip-and-west-bank-including-east-jerusalem>; International Rescue Committee (‘IRC’), *IRC and MAP condemn Israeli airstrike on Gaza compound housing Emergency Medical Team* (31 January 2024), <https://www.rescue.org/en/press-release/irc-and-map-condemn-israeli-airstrike-gaza-compound-housing-emergency-medical-team>; Humanity & Inclusion, *HI office in Gaza destroyed* (2 February 2024), <https://www.hi.org/en/news/hi-office-in-gaza-destroyed>; Médecins du Monde, *Médecins du Monde condemns the destruction of its offices in Gaza City* (12 February 2024), <https://www.medecinsdumonde.org/en/news/medecins-du-monde-condemns-the-destruction-of-its-offices-in-gaza-city/>; MSF, *Gaza: Israeli forces attack MSF shelter in Al-Mawasi* (21 February 2024), <https://www.doctorswithoutborders.org/latest/gaza-israeli-forces-attack-msf-shelter-al-mawasi>; Kingdom of Belgium Federal Public Service Foreign Affairs, *Belgium summons Israeli ambassador and strongly condemns bombing of Belgian development agency Enabel* (2 February 2024), <https://diplomatie.belgium.be/en/news/belgium-summons-israeli-ambassador-and-strongly-condemns-bombing-belgian-development-agency-enabel>; Forensic Architecture, *Attacks on Aid in Gaza: Preliminary Findings* (26 April 2024), <https://forensic-architecture.org/investigation/attacks-on-aid-in-gaza-preliminary-findings>, “[t]he frequency and widespread nature of these attacks, visualised within our map, indicate a pattern of systematic targeting, such that the mechanisms for distributing, accessing, and organising aid have been critically compromised.”

²⁸⁰ See, generally, ICRC Customary Law Study, Rules 25–30. Special protection also extends to medical activities (Rule 26), medical units (Rule 28), and medical transport (Rule 29).

²⁸¹ UN OCHA, *Reported impact snapshot | Gaza Strip (19 November 2024)* (19 November 2024), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-19-november-2024>. See also UN OHCHR, *Statement on the killing and arbitrary detention of health workers in Gaza* (25 June 2024), <https://www.un.org/unispal/document/statement-gaza-ohchr-25jun24/>. See also HWW, *Killing of Healthcare Workers by Israeli Occupation Forces in Palestine since October 7, 2023* (14 June 2024), <https://healthcareworkerswatch.org/wp-content/uploads/2024/09/HWW-report-on-killed-HCWs-in-Palestine-14.06.2024-Update.pdf>, p. 3, which puts the total number of health care workers killed at 541.

²⁸² MAP, *500 healthcare workers killed during Israel’s military assault on Gaza* (26 June 2024), <https://www.map.org.uk/news/archive/post/1598-500-healthcare-workers-killed-during-israelas-military-assault-on-gaza> (emphasis added).

of healthcare workers in *all* conflicts globally in 2021 and 2022 combined.²⁸³ Aside from killings, Israel has targeted them in other ways. According to the UN OHCHR, “[h]ealth workers have been subjected to other serious violations under international humanitarian and human rights law”, including through the detention of “health personnel, including hospital directors” by the Israeli military.²⁸⁴ As of 25 June 2024, “the number of health workers detained by Israeli military since 7 October stands at 310.”²⁸⁵ By September 2024 Health Workers Watch, a nongovernmental organisation, had collected over 50 accounts describing torture of health workers by Israeli authorities.²⁸⁶ The killings, detention and enforced disappearances of health workers in Gaza have also happened in parallel with the systematic attacks and destruction of hospitals, health facilities and infrastructure²⁸⁷ (including housing used by medical workers²⁸⁸ and medical organisations²⁸⁹). The sheer scale of these attacks on health workers and infrastructure is staggering. As Physicians for Human Rights (‘PHR’) drew attention to on 2 August 2024, relying on data from the WHO, “[m]ore than 1000 attacks have now been recorded on health workers, patients, hospitals, and other medical infrastructure in the Occupied Palestinian Territories (OPT) since October 7, 2023, more reported attacks on health care than any other conflict over a 10-month period on record”.²⁹⁰ Forensic Architecture’s detailed investigation into Israeli’s targeting of medical infrastructure between 7 October and 1 August 2024 “reveals a pattern of attacks on healthcare workers, facilities and services that suggests a deliberate attempt to cause damage to Gaza’s medical system with possible long-term effects.”²⁹¹ This is confirmed by the Commission of Inquiry, which found that Israel’s “[a]ttacks on health-care facilities are an intrinsic element of the Israeli security

²⁸³ *Ibid.*, (emphasis added).

²⁸⁴ UN OHCHR, *UN Human Rights Office – OPT: Statement on the killing and arbitrary detention of health workers in Gaza* (25 June 2024), <https://reliefweb.int/report/occupied-palestinian-territory/un-human-rights-office-opt-statement-killing-and-arbitrary-detention-health-workers-gaza>. See also, UN OHCHR, *Thematic Report Detention in the context of the escalation of hostilities in Gaza (October 2023-June 2024)* (31 July 2024), <https://www.ohchr.org/sites/default/files/documents/countries/opt/20240731-Thematic-report-Detention-context-Gaza-hostilities.pdf>, para. 13, noting: “Doctors, nurses and other medical personnel, alongside patients, their companions, and IDPs, have been arrested or detained during raids on hospitals and medical facilities.”

²⁸⁵ UN OHCHR, *Statement on the killing and arbitrary detention of health workers in Gaza* (25 June 2024), <https://www.un.org/unispal/document/statement-gaza-ohchr-25jun24/>.

²⁸⁶ HWW, *Unlawful Detention of Healthcare Workers by Israeli Occupation Forces in Palestine since October 7, 2023* (20 September 2024), <https://healthcareworkerswatch.org/wp-content/uploads/2024/09/4.-HWW-Update-on-unlawful-detention-of-HCWs-in-Palestine-September-20-2024.pdf>; HWW, *The Killing, Detention and Torture of Healthcare Workers in Gaza* (7 October 2024), https://healthcareworkerswatch.org/wp-content/uploads/2024/10/HWW-report_The-killing-detention-and-torture-of-HCWs-in-Gaza_October-7-2024_Final.pdf, p. 15.

²⁸⁷ WHO, *oPt Emergency Situation Update, Issue 36* (15 July 2024), https://www.emro.who.int/images/stories/Sitrep_-_issue_36c.pdf?ua=1, p. 3. By 12 July 2024, according to the WHO, there had been 475 attacks on health care, effecting 103 health facilities, including damaging 32 hospitals, leading to 746 fatalities in these attacks, and 967 injuries, and affecting 113 ambulances (with 61 damaged).

²⁸⁸ International Rescue Committee (‘IRC’), *IRC and MAP condemn Israeli airstrike on Gaza compound housing Emergency Medical Team* (31 January 2024), <https://www.rescue.org/en/press-release/irc-and-map-condemn-israeli-airstrike-gaza-compound-housing-emergency-medical-team>.

²⁸⁹ Médecins du Monde, *Médecins du Monde condemns the destruction of its offices in Gaza City* (12 February 2024), <https://www.medecinsdumonde.org/en/news/medecins-du-monde-condemns-the-destruction-of-its-offices-in-gaza-city/>; MSF, *Gaza: Israeli forces attack MSF shelter in Al-Mawasi* (21 February 2024), <https://www.doctorswithoutborders.org/latest/gaza-israeli-forces-attack-msf-shelter-al-mawasi>.

²⁹⁰ Physicians for Human Rights (‘PHR’), *1000 Attacks on Health Care in the Occupied Palestinian Territories (OPT) Devastate Health System, Demand Accountability: PHR* (2 August 2024), <https://phr.org/news/1000-attacks-on-health-care-in-the-occupied-palestinian-territories-opt-devastate-health-system-demand-accountability-phr/> (emphasis added), data sourced from the WHO’s Surveillance System for Attacks on Health Care, <https://extranet.who.int/ssa/Index.aspx>.

²⁹¹ Forensic Architecture, *A Spatial Analysis of the Israeli Military’s Conduct in Gaza since October 2023, Chapter 5: Destruction of Medical Infrastructure* (15 October 2024), p. 436, para. 184. See also conclusion at p. 436, para. 185: “The attacks on healthcare across several elements of its infrastructure, across multiple incidents, demonstrates widespread pattern of destruction to Gaza’s healthcare system. The combination and repetition of these forms of attack by the Israeli military suggests the targeting of medical infrastructure is not accidental. The attacks target both the physical and social elements of healthcare, suggesting an effort to destroy medical infrastructure in Gaza. The targeting of healthcare workers, services, and facilities across Gaza poses long-term impacts through the elimination of a skilled workforce, access to healthcare, and the physical infrastructure that provides healthcare.”

forces' broader assault on Palestinians in Gaza and the physical and demographic infrastructure of Gaza, as well as of efforts to expand the occupation."²⁹²

63. **Attacks on journalists:** Journalists have also been systematically pursued and attacked by Israel, paying a particularly high price for their attempts to report about Israel's violations and the resulting suffering of the Palestinians (including through attacks, arrests, and threats).²⁹³ Between 7 October 2023 and 26 February 2024, according to UN OCHA, 124 journalists and media workers had been killed by Israel in Gaza,²⁹⁴ rendering it the most dangerous conflict for journalists in recent history.²⁹⁵ United Nations experts have drawn attention to "the extraordinarily high numbers of journalists and media workers who have been killed, attacked, injured and detained in the Occupied Palestinian Territory, particularly in Gaza, in recent months blatantly disregarding international law."²⁹⁶ They also decried the "disturbing reports that, despite being clearly identifiable in jackets and helmets marked 'press' or travelling in well-marked press vehicles, journalists have come under attack" and emphasised that these attacks "would seem to indicate that the killings, injury, and detention are a deliberate strategy by Israeli forces to obstruct the media and silence critical reporting".²⁹⁷ Reporters Without Borders ('RSF') has condemned the "eradication of journalism and the right to information in Gaza by the Israeli army",²⁹⁸ also presenting evidence that journalists were deliberately targeted.²⁹⁹ Arab Reporters for Investigative Journalism partnered with 13 other news organisations to investigate the killing, injury, detention, and threats against Palestinian journalists and the destruction of media offices in Gaza.³⁰⁰ Their investigation confirmed that the number of journalists killed by June 2024 was record-breaking, with 1 in 10 reporters in Gaza having been killed as part of Israel's campaign.³⁰¹ As they determined from their investigations, "Dozens of journalists said they believed they were being targeted by the Israeli army."³⁰² Israel's attacks on journalists have also included attacks on media infrastructure, such as deliberately targeting cameras filming live from the Gaza Strip and destroying buildings housing press organisations, with the objective of "stifling information and preventing the reality of the ongoing war from being broadcast to the

²⁹² UNGA, *Report of the Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel*, A/79/232 (11 September 2024), <https://documents.un.org/doc/undoc/gen/n24/262/79/pdf/n2426279.pdf>, p. 18, para. 88.

²⁹³ See, Committee to Protect Journalists, *Journalist casualties in the Israel-Gaza war* (11 October 2024), <https://cpj.org/2024/09/journalist-casualties-in-the-israel-gaza-conflict/>; Committee to Protect Journalists, *Attacks, arrests, threats, censorship: The high risks of reporting the Israel-Gaza war* (11 October 2024) <https://cpj.org/2024/09/attacks-arrests-threats-censorship-the-high-risks-of-reporting-the-israel-hamas-war/>; Committee to Protect Journalists, *Arrests of Palestinian journalists since start of Israel-Gaza war* (11 October 2024), <https://cpj.org/2024/09/arrests-of-palestinian-journalists-since-start-of-israel-gaza-war/>.

²⁹⁴ UN OCHA, *Hostilities in the Gaza Strip and Israel - reported impact | Day 142* (26 February 2024), <https://www.ochaopt.org/content/hostilities-gaza-strip-and-israel-reported-impact-day-142>. See, e.g., UN OCHA, *Hostilities in the Gaza Strip and Israel | Flash Update #118* (14 February 2024), <https://www.ochaopt.org/content/hostilities-gaza-strip-and-israel-flash-update-118>.

²⁹⁵ UN OHCHR, *Gaza: UN experts condemn killing and silencing of journalists* (1 February 2024), <https://www.ohchr.org/en/press-releases/2024/02/gaza-un-experts-condemn-killing-and-silencing-journalists>.

²⁹⁶ *Ibid.*

²⁹⁷ *Ibid.*

²⁹⁸ Reporters Without Borders, *Gaza: In four months of war, Palestinian journalism has been decimated with impunity* (7 February 2024), <https://rsf.org/en/gaza-four-months-war-palestinian-journalism-has-been-decimated-impunity>.

²⁹⁹ See Defence for Children International Palestine et al., v. Joseph R. Biden, Antony Blinken and Lloyd James Austin III, Brief of Amicus Curiae of the Palestinians Journalists Syndicate in Support of Plaintiffs Motion for Injunction for Preliminary Relief (26 January 2024), https://ccrjustice.org/sites/default/files/attach/2023/12/50-1_12-29-23_Palestine-Journalists-Syndicate-Amicus_w.pdf.

³⁰⁰ Hoda Osman et al., "Israel's War On Gaza Is The Deadliest Conflict On Record For Journalists", *The Intercept* (25 June 2024), <https://theintercept.com/2024/06/25/israel-gaza-war-journalists-killed/>.

³⁰¹ *Ibid.*

³⁰² *Ibid.* See also, Harry Davis et al., "'The grey zone': how IDF views some journalists in Gaza as legitimate targets", *The Guardian* (25 June 2024), <https://www.theguardian.com/world/article/2024/jun/25/grey-zone-how-hamas-linked-journalists-legitimate-targets>.

world”,³⁰³ as well as attacking local radio stations, news agencies, transmission towers, and journalist training institutes.³⁰⁴

64. Israel has systematically attacked these categories of protected individuals. It has done so indiscriminately and intentionally, as is apparent from: (i) the number of incidents; (ii) the systematic nature of those incidents; (iii) the patterns of such attacks; (iv) the absence of apparent efforts on the part of Israel to distinguish and to take precautions in attacking them (and despite journalists being clearly marked and identified as members of the press); and (v) the resounding absence of effective investigation of these incidents. These attacks are, therefore, not just tolerated by Israel, but concerted and deliberate State policy. Attacking humanitarian personnel is an integral part of Israel’s policy of denying Palestinians in Gaza basic necessities and of the associated purpose of starvation. Its attacks on journalists evidence a strategy of impunity by which it seeks to prevent the dissemination of information pertaining to its breaches of the Convention.

E: The pattern of Israel’s destruction of Palestinian life in Gaza

65. Israel has engaged in a pattern of repeated genocidal conduct that has destroyed every aspect of Palestinian life in Gaza. Through this pattern of destruction, Israel’s intent to destroy the social and cultural defining features of the protected group as well as the very objects and institutions that sustain life in Gaza is laid bare. ‘Destruction’ for the purpose of the Genocide Convention is generally understood in the narrow sense of physical or biological destruction, however the destruction of the built environment that a group relies on for survival as well as the destruction of the economy can constitute part of the genocidal conduct by causing or contributing significantly to serious bodily or mental harm to members of a group, or deliberately inflicting on the group of conditions of life calculated to bring about its physical destruction in whole or in part. Israel’s destruction of Palestinian Life in Gaza has included the destruction and looting of social, cultural and religious sites and repositories; attacking and destroying libraries, archives, and cultural centres; killing Palestinians who contributed to or maintained Gaza’s cultural life; decimating Gaza’s education system by destroying schools and universities, and killing professors and teachers; and targeting all infrastructure in Gaza essential to enabling the survival of Palestinians, both in the immediate and in the long-term.
66. United Nations Experts have recorded that Israel’s actions have resulted in damage to or destruction of about 195 heritage sites,³⁰⁵ while UNESCO had by October 2024 already verified damage to 69 of those sites.³⁰⁶ Forensic Architecture found 90 per cent of the cultural heritage sites they analysed were attacked.³⁰⁷ Damaged and

³⁰³ Léa Peruchon, “The destruction of press infrastructure in Gaza: A strategy to blind the public”, *Forbidden Stories* (25 June 2024), <https://forbiddenstories.org/the-destruction-of-press-infrastructure-in-gaza-a-strategy-to-blind-the-public/>.

³⁰⁴ *Ibid.*

³⁰⁵ UN OHCHR, *UN experts deeply concerned over ‘scholasticide’ in Gaza* (18 April 2024), <https://www.ohchr.org/en/press-releases/2024/04/un-experts-deeply-concerned-over-scholasticide-gaza>. See also, Kaamil Ahmed, “‘Everything beautiful has been destroyed’: Palestinians mourn a city in tatters”, *The Guardian* (4 February 2024), <https://www.theguardian.com/world/2024/feb/04/everything-beautiful-has-been-destroyed-palestinians-mourn-a-city-in-tatters>.

³⁰⁶ UNESCO, *Gaza Strip: Damage assessment* (11 October 2024), <https://www.unesco.org/en/gaza/assessment>.

³⁰⁷ Forensic Architecture, *A Spatial Analysis of the Israeli Military’s Conduct in Gaza since October 2023* (15 October 2024), p. 43, Datasets used from UNESCO, p. 511, and p. 657 ff.

destroyed archaeological sites include Tell ³⁰⁸ el-Ajjul and Tell Rafah, ³⁰⁹ the Anthedon Harbor ('Al Balakhiya'),³¹⁰ Al Pasha Palace ('Qasr Al Basha'),³¹¹ which dates back to the 13th Century;³¹² Hammam Al Samra (Al Samra Bathhouse);³¹³ and much of Gaza's Old City.³¹⁴ Key repositories of Palestinian cultural heritage destroyed, damaged or looted by the Israeli military include the 'Al Mathaf' Hotel,³¹⁵ the Deir Al Balah Museum, Qarara Museum, Khan Younis Museum, Rafah Museum and the Rafah Folk Museum.³¹⁶ Damage was also reported to the Ministry of Tourism and Antiquities' storage facility of moveable cultural objects, which was broken into by the Israeli military.³¹⁷

³⁰⁸ A tell is an archaeological mound, formed when activities and settlement were conducted at a site over time and sediment and material accumulation rates exceeded those of truncation or erosion. See Wendy Matthews, "Tells in Archaeology", *Global Encyclopaedia of Archaeology* (26 October 2020), https://link.springer.com/referenceworkentry/10.1007/978-3-030-30018-0_1512.

³⁰⁹ UNESCO, *Gaza Strip: Damage assessment* (11 October 2024), <https://www.unesco.org/en/gaza/assessment>; Forensic Architecture, *A Spatial Analysis of the Israeli Military's Conduct in Gaza since October 2023* (15 October 2024), p. 706; Dr. Mohammedmoin Sadeq, "Gaza Economy and Trade during the Bronze Age", *International Journal of Humanities and Social Science Review* (December 2017), <https://ijhssrnet.com/wp-content/uploads/2022/11/3-22.pdf>; Dr. Moain Sadeq, "Urban History of South-Western Palestine during the Bronze Age", *International Journal of Business, Humanities and Technology* (December 2012), <https://www.ancientportsantiques.com/wp-content/uploads/Documents/PLACES/Levant/Gaza-Sadeq2012.pdf>; H4P and ANSCH, *Report on the Impact of the Recent War in 2023 on the Cultural Heritage in Gaza Strip – Palestine* (7 November 2023), <https://www.heritageforpeace.org/wp-content/uploads/2024/01/Report-on-the-Impact-of-the-Recent-War-in-2023-on-the-Cultural-Heritage-in-Gaza-Strip-Palestine-English.pdf>.

³¹⁰ UNESCO, *Tentative Lists: Anthedon Harbor* (2 April 2012), <https://whc.unesco.org/en/tentativelists/5719/>; H4P and ANSCH, *Report on the Impact of the Recent War in 2023 on the Cultural Heritage in Gaza Strip – Palestine* (7 November 2023), <https://www.heritageforpeace.org/wp-content/uploads/2024/01/Report-on-the-Impact-of-the-Recent-War-in-2023-on-the-Cultural-Heritage-in-Gaza-Strip-Palestine-English.pdf>, p. 31, "Complete destruction. Direct shelling"; Forensic Architecture, *Living Archeology in Gaza — Update 19.12.2023* (19 December 2023), <https://forensic-architecture.org/investigation/living-archaeology-in-gaza>.

³¹¹ Bellingcat, *Analysis Reveals Damage and Destruction of Cultural Heritage Sites in Gaza* (26 June 2024), <https://www.bellingcat.com/news/2024/06/26/gaza-israel-destroy-destruction-damage-cultural-history-heritage-archaeology-conflict-war/>, [8:22-8:56]; Forensic Architecture, *A Spatial Analysis of the Israeli Military's Conduct in Gaza since October 2023* (15 October 2024), p. 705.

³¹² Palestine Association on Monuments and Sites ('ICOMOS Palestine'), *Report #3: New evidences indicated the devastation in Palestine: Genocide, Urbicide and Ecocide (Documentation and evidence gathered: December 16th 2023 – January 31th, 2024)* (2 February 2024), <https://openarchive.icomos.org/id/eprint/3240/15/Report%233.pdf>, p. 5; The Ministry of Tourism and Antiquities, Gaza, "Preserving the Past: The Revitalization of Al-Pasha Palace in Gaza City", *This Week in Palestine* (5 February 2023), <https://thisweekinpalestine.com/preserving-the-past/>.

³¹³ ICOMOS Palestine, *Report #3: New evidences indicated the devastation in Palestine: Genocide, Urbicide and Ecocide (Documentation and evidence gathered: December 16th 2023 – January 31th, 2024)* (2 February 2024), <https://openarchive.icomos.org/id/eprint/3240/15/Report%233.pdf>, p. 7; Forensic Architecture, *A Spatial Analysis of the Israeli Military's Conduct in Gaza since October 2023* (15 October 2024), p. 705.

³¹⁴ Yousif Al-Daffaie, "The destruction of Gaza's historic buildings is an act of 'urbicide'", *The Conversation* (20 February 2024), <https://theconversation.com/the-destruction-of-gaza-s-historic-buildings-is-an-act-of-urbicide-223672>; UNESCO, *Gaza Strip: Damage Assessment* (11 October 2024), <https://www.unesco.org/en/gaza/assessment>.

³¹⁵ UNESCO, *Gaza Strip: Damage Assessment* (11 October 2024), <https://www.unesco.org/en/gaza/assessment>; State of Palestine, Ministry of Culture, *The Third Preliminary Report on the Cultural Sector's Damages* (7 January 2024), <https://palestinemission.ie/wp-content/uploads/2024/01/The-Third-Preliminary-Report-on-the-cultural-Sectors-Damage-Gaza.pdf>, p. 62.

³¹⁶ ICOMOS Palestine, *Report #3: New evidences indicated the devastation in Palestine: Genocide, Urbicide and Ecocide (Documentation and evidence gathered: December 16th 2023 – January 31th, 2024)* (2 February 2024), <https://openarchive.icomos.org/id/eprint/3240/15/Report%233.pdf>, p. 10; Ibtisam Mahdi, "The obliteration of Gaza's multi-civilizational treasures", *+952 Magazine* (17 February 2024), <https://www.972mag.com/the-obliteration-of-gazas-multi-civilizational-treasures/>; State of Palestine, Ministry of Culture, *The Third Preliminary Report on the Cultural Sector's Damages* (7 January 2024), <https://palestinemission.ie/wp-content/uploads/2024/01/The-Third-Preliminary-Report-on-the-cultural-Sectors-Damage-Gaza.pdf>.

³¹⁷ UNESCO, *Gaza Strip: Damage Assessment* (11 June 2024), <https://www.unesco.org/en/gaza/assessment>. See also "The deputy director of the Antiquities Authority was 'jumped' to Gaza to inspect an antiquities warehouse", *Makom* (17 November 2024), <https://www.ha-makom.co.il/post-dor-gaza-kad>; Forensic Architecture, *A Spatial Analysis of the Israeli Military's Conduct in Gaza since October 2023* (15 October 2024), p. 705.

67. UN OCHA reported that by May 2024 at least 247 mosques had been damaged or destroyed, as well as three churches.³¹⁸ Forensic Architecture further reported that by July 2024, 80 per cent of all religious institutions in Gaza had been attacked, 143 were damaged and 130 were destroyed.³¹⁹ Mosques destroyed or damaged include the 800 year-old Shaikh Zakaria Mosque and the Al Omari Mosque, originally a fifth century Byzantine church and a place of worship by Christians and Muslims for over 1,000 years.³²⁰ The St. Porphyrius church — considered the third oldest church in the world — was damaged, with the church compound hit twice by Israel: once in October 2023 and once in July 2024.³²¹
68. Israel has attacked facilities essential to maintaining contemporary Palestinian public, intellectual and cultural life in Gaza, including libraries, archives, and cultural centres.³²² These include 13 public libraries;³²³ the Dar Al Sa'ada Dome and Manuscript Center;³²⁴ and the Central Archives of Gaza City — which contained thousands of historical documents dating for more than 150 years, including plans of ancient buildings of historical value, and handwritten documents of known national figures.³²⁵ The invaluable mementos and memories of shared lives and loved ones have also been destroyed.³²⁶ Palestinians who contributed to or maintained Gaza's cultural heritage have been killed by Israel, including at least 45 writers, artists and others active in the field of culture and heritage.³²⁷

³¹⁸ UN OCHA, *Hostilities in the Gaza Strip and Israel - reported impact | Day 224* (17 May 2024),

<https://www.ochaopt.org/content/hostilities-gaza-strip-and-israel-reported-impact-day-224>. See also, investigative journalists verification of the damage or destruction of hundred mosques in Gaza: Bellingcat, *Analysis Reveals Damage and Destruction of Cultural Heritage Sites in Gaza* (26 June 2024), <https://www.bellingcat.com/news/2024/06/26/gaza-israel-destroy-destruction-damage-cultural-history-heritage-archaeology-conflict-war/> [9:18-10:00]; Younis Tirawi, @ytirawi, Tweet (11:54 pm, 11 April 2024), <https://x.com/ytirawi/status/1778542167612592554>; See, Younis Tirawi, @ytirawi, Tweet (1:17 pm, 13 May 2024), <https://x.com/ytirawi/status/1789978344311648368>; Ran Oz, Facebook (7 February 2024), <https://www.facebook.com/100001992528868/videos/pcb.7160113260731687/3479421175641664>. See also, Younis Tirawi, @ytirawi, Tweet (2:33 pm, 12 June 2024), <https://x.com/ytirawi/status/1800868996256084227>; Middle East Eye, @MiddleEastEye, Tweet (3:30 am, 6 February 2024), <https://twitter.com/MiddleEastEye/status/1754678805921509547>.

³¹⁹ Forensic Architecture, *A Spatial Analysis of the Israeli Military's Conduct in Gaza since October 2023* (15 October 2024), pp. 507 and 649 ff.

³²⁰ UNESCO, *Gaza Strip: Damage assessment* (11 October 2024), <https://www.unesco.org/en/gaza/assessment>; Forensic Architecture, *A Spatial Analysis of the Israeli Military's Conduct in Gaza since October 2023* (15 October 2024), p. 705.

³²¹ UNESCO, *Gaza Strip: Damage assessment* (11 October 2024), <https://www.unesco.org/en/gaza/assessment>. Amnesty International, *Israel/OPT: 'Nowhere safe in Gaza': Unlawful Israeli strikes illustrate callous disregard for Palestinian lives* (20 November 2023), <https://www.amnesty.org/en/latest/news/2023/11/israel-opt-nowhere-safe-in-gaza-unlawful-israeli-strikes-illustrate-callous-disregard-for-palestinian-lives/>. The Church was attacked a second time in July 2024, World Council of Churches, *WCC condemns attacks on St Porphyrius Church in Gaza and Golan Heights* (31 July 2024), <https://www.oikoumene.org/news/wcc-condemns-attacks-on-st-porphyrius-church-in-gaza-and-golan-heights>.

³²² UNESCO, *Gaza Strip: Damage Assessment* (11 October 2024), <https://www.unesco.org/en/gaza/assessment>; State of Palestine, Ministry of Culture, *The Third Preliminary Report on the Cultural Sector's Damages* (7 January 2024), <https://palestinemission.ie/wp-content/uploads/2024/01/The-Third-Preliminary-Report-on-the-cultural-Sectors-Damage-Gaza.pdf>.

³²³ UN OHCHR, *UN experts deeply concerned over 'scholasticide' in Gaza* (18 April 2024), <https://www.ohchr.org/en/press-releases/2024/04/un-experts-deeply-concerned-over-scholasticide-gaza>.

³²⁴ Forensic Architecture, *A Spatial Analysis of the Israeli Military's Conduct in Gaza since October 2023* (15 October 2024), p. 705; UNESCO, *Gaza Strip: Damage Assessment* (11 October 2024), <https://www.unesco.org/en/gaza/assessment>.

³²⁵ *Ibid*; Mohammed Majed, "Israel destroyed Central Archives of Gaza City: Head of Gaza municipality", *Anadolu Agency* (29 November 2023), <https://www.aa.com.tr/en/middle-east/-israel-destroyed-central-archives-of-gaza-city-head-of-gaza-municipality/3068555>.

³²⁶ State of Palestine, Ministry of Culture, *The Third Preliminary Report on the Cultural Sector's Damages* (7 January 2024), <https://palestinemission.ie/wp-content/uploads/2024/01/The-Third-Preliminary-Report-on-the-cultural-Sectors-Damage-Gaza.pdf>.

³²⁷ State of Palestine, Ministry of Culture, *Palestinian Culture and Statistics issues a press release on the occasion of the National Day of Palestinian Culture* (13 March 2024), <https://moc.pna.ps/article/2829/--الاحتفاء باليوم الوطني الفلسطيني في غزة>

69. Israel has also attacked Gaza's social and civic life, systematically targeting municipality workers³²⁸ and police officers;³²⁹ and attacking essential legislative and judicial infrastructure and personnel. It has also systematically attacked government buildings (82 per cent of all government buildings in Gaza, 17 were damaged and 20 were destroyed);³³⁰ Gaza's entire Palace of Justice — housing the Magistrates Court, the Court of First Instance, the Court of Appeal and the Supreme Court.³³¹
70. Israel has further systematically targeted the education system — one of the most important elements of the long-term viability of any community and group³³² — which has been decimated by months of Israeli bombings and killings.³³³ *Israel has attacked the overwhelming majority (81 per cent) of universities, (destroying 18 and damaging a further 18)*³³⁴ and killed more than 90 university professors in Gaza.³³⁵ According to Gaza's Ministry of Education, 11,411 Palestinian students have been killed, along with 711 educational staff; while approximately 658,000 students have been deprived of an education over the last 12 months.³³⁶
71. Israel has also extensively targeted all infrastructure in Gaza essential to enabling the survival of Palestinians, both in the immediate and in the long-term. By January 2024, 62 per cent of all residential buildings in Gaza had been either damaged or destroyed;³³⁷ 62 per cent of the road network and 92 per cent of primary roads in Gaza were also destroyed or damaged,³³⁸ 70 per cent of physical infrastructure in the health

³²⁸ UN OCHA, *Humanitarian Situation Update #181 | Gaza Strip* (21 June 2024),

<https://www.ochaopt.org/content/humanitarian-situation-update-181-gaza-strip>.

³²⁹ UN OHCHR, *UN Human Rights Office – OPT: Attacks on the humanitarian aid distribution system* (22 March 2024),

<https://reliefweb.int/report/occupied-palestinian-territory/un-human-rights-office-opt-attacks-humanitarian-aid-distribution-system-enar>; UN OCHA, *Hostilities in the Gaza Strip and Israel | Flash Update #113* (7 February 2024),

<https://www.ochaopt.org/content/hostilities-gaza-strip-and-israel-flash-update-113>.

³³⁰ Forensic Architecture, *A Spatial Analysis of the Israeli Military's Conduct in Gaza since October 2023* (15 October 2024), p. 43.

³³¹ Emanuel Fabian, @manniefabian, Tweet (12:29 pm, 4 December 2024),

<https://x.com/manniefabian/status/1731621793385812234>; Forensic Architecture, *A Spatial Analysis of the Israeli Military's Conduct in Gaza since October 2023* (15 October 2024), pp. 521, 541, and 546–554.

³³² UN OHCHR, *UN experts deeply concerned over 'scholasticide' in Gaza* (18 April 2024), <https://www.ohchr.org/en/press-releases/2024/04/un-experts-deeply-concerned-over-scholasticide-gaza>.

³³³ The World Bank, UN, EU, *Gaza Strip - Interim Damage Assessment: Summary Note - March 29, 2024* (29 March 2024),

<https://thedocs.worldbank.org/en/doc/14e309cd34e04e40b90eb19afa7b5d15-0280012024/original/Gaza-Interim-Damage-Assessment-032924-Final.pdf>, pp. 12 - 13.

³³⁴ Forensic Architecture, *A Spatial Analysis of the Israeli Military's Conduct in Gaza since October 2023* (15 October 2024),

p. 43. UN OHCHR, *UN experts deeply concerned over 'scholasticide' in Gaza* (18 April 2024),

<https://www.ohchr.org/en/press-releases/2024/04/un-experts-deeply-concerned-over-scholasticide-gaza>; Chantal da Silva *et al.*,

"Class Destroyed", *NBC News* (4 April 2024), <https://www.nbcnews.com/specials/gaza-universities-destroyed-israel-military-war/index.html>; UNESCO, *Impact on the education sector*, <https://www.unesco.org/en/gaza/education?hub=102070>;

see Palestinian Central Bureau of Statistics, *Distribution of Higher Education Institutions in Palestine by Type of Institution and Region* (2021/2022), https://www.pcbs.gov.ps/Portals/_Rainbow/Documents/Higher_Education_2021_01E.html.

³³⁵ UN OHCHR, *UN experts deeply concerned over 'scholasticide' in Gaza* (18 April 2024), <https://www.ohchr.org/en/press-releases/2024/04/un-experts-deeply-concerned-over-scholasticide-gaza>.

³³⁶ UN OCHA, *Reported impact snapshot | Gaza Strip* (19 November 2024) (19 November 2024),

<https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-19-november-2024>.

³³⁷ The World Bank, United Nations (UN), European Union (EU), *Gaza Strip - Interim Damage Assessment: Summary Note - March 29, 2024* (29 March 2024), <https://thedocs.worldbank.org/en/doc/14e309cd34e04e40b90eb19afa7b5d15-0280012024/original/Gaza-Interim-Damage-Assessment-032924-Final.pdf>, p. 11. See also, UNOSAT, *Gaza Strip Comprehensive Damage Assessment - January 2024* (1 February 2024), <https://unosat.org/products/3793> (93,800 housing units); and UN ESCWA, *Assessment of physical damage caused to buildings by the war on Gaza: October 2023 – April 2024* (7 May 2024), <https://www.unescwa.org/sites/default/files/pubs/pdf/assessment-physical-damage-buildings-war-gaza-english.pdf>, p. 18; around 50 percent (low estimate) to around 60 per cent (high estimate).

³³⁸ The World Bank, United Nations (UN), European Union (EU), *Gaza Strip – Interim Damage Assessment: Summary Note – March 29, 2024* (29 March 2024), <https://thedocs.worldbank.org/en/doc/14e309cd34e04e40b90eb19afa7b5d15-0280012024/original/Gaza-Interim-Damage-Assessment-032924-Final.pdf>, p. 15; Forensic Architecture, *A Spatial Analysis of the Israeli Military's Conduct in Gaza since October 2023* (15 October 2024), p. 44, finding damage to 47.3 per cent of the main roads in North Gaza and 33.7 per cent of damage to the main roads in South Gaza.

sector, commerce, industry, services, ICT and municipal services sector had been destroyed;³³⁹ as had 61.5 per cent of the electricity distribution network³⁴⁰ and 57 per cent of water, sanitation and hygiene infrastructure.³⁴¹ A further 82 per cent of private sector establishments and 83 per cent of retail facilities (including bakeries, grocers, and supermarkets) in Gaza have been either damaged or fully destroyed;³⁴² together with between 80 and 96 per cent of all agricultural assets with clear short and long-term consequences for nutrition and food security in Gaza.³⁴³ Based on these figures, UNCTAD's preliminary assessment in January 2024 estimated that "in an optimistic scenario of double-digit growth rates facilitated by a large injection of foreign aid, it will take decades for Gaza to return to pre-October 2023 welfare levels", and it would take Gaza "70 years just to restore the GDP levels of 2022 with GDP per capita continuously and precipitously declining given the population growth rate."³⁴⁴ Over the next months, the International Labor Organization ('ILO') would observe that "Gaza has witnessed an almost complete destruction of economic activity in all sectors."³⁴⁵ By May 2024, UNDP assessed that "[e]ven with an optimistic scenario and with a five-fold increase of construction materials . . . allowed into Gaza, it would take until 2040 to reconstruct the destroyed housing units."³⁴⁶

72. Yet, between May and July 2024 destruction rates in Gaza *doubled*, and damage rates *tripled*, compared to the period between February and May 2024.³⁴⁷ By the beginning of July 2024, 55 per cent of health facilities in Gaza were destroyed or damaged; 53 per cent of utilities (including power plants, water wells, desalination plants, and fuel stations);³⁴⁸ over two thirds of the entire road network;³⁴⁹ 47 per cent of urban water wells and 60 per cent of water tanks were either damaged or destroyed.³⁵⁰ 100 per cent of wastewater facilities had been either damaged or rendered non-functional.³⁵¹
73. With respect to Gaza's environment, agricultural lands and systems in Gaza have been systematically destroyed, with large areas rendered permanently unusable.³⁵² According to UNCTAD: "The impact of the military operation on the agricultural sector is of particular concern", not only because of the clear implications for immediate and long-term food security, but also "given the historical role of the sector in providing income, jobs . . . and in serving as a shock absorber that provides employment for displaced

³³⁹ *Ibid*, p. 10.

³⁴⁰ *Ibid*, p. 15.

³⁴¹ *Ibid*, pp. 10 and 15. See also: Yara Asi, *et al.*, "'Nowhere and no one is safe': spatial analysis of damage to critical civilian infrastructure in the Gaza Strip during the first phase of the Israeli military campaign, 7 October to 22 November 2023", *Conflict and Health* (2 April 2024), <https://conflictandhealth.biomedcentral.com/articles/10.1186/s13031-024-00580-x>, p. 7.

³⁴² The World Bank, *Note on the Impacts of the Conflict in the Middle East on the Palestinian Economy* (February 2024), <https://thedocs.worldbank.org/en/doc/db985000fa4b7237616dbca501d674dc-0280012024/note-on-the-impacts-of-the-conflict-in-the-middle-east-on-the-palestinian-economy>, p. 6.

³⁴³ *Ibid*, p. 8.

³⁴⁴ UNCTAD, *Preliminary assessment of the economic impact of the destruction in Gaza and prospects for economic recovery*, UNCTAD rapid assessment (January 2024), https://unctad.org/system/files/official-document/osginf2024d1_en.pdf, p. 12.

³⁴⁵ International Labour Organisation ('ILO') in UN News, *Planning the post-war reconstruction and recovery of Gaza* (6 April 2024), <https://news.un.org/en/story/2024/04/1148296>.

³⁴⁶ United Nations Development Programme ('UNDP'), *Gaza War: Expected Socio-Economic Impacts on the State of Palestine: Update | April 2024* (2 May 2024), <https://www.undp.org/arab-states/publications/gaza-war-expected-socio-economic-impacts-state-palestine-0>, p. 2.

³⁴⁷ Forensic Architecture, *A Spatial Analysis of the Israeli Military's Conduct in Gaza since October 2023* (15 October 2024), p. 590.

³⁴⁸ *Ibid*, see also pp. 608 and 624.

³⁴⁹ Forensic Architecture, *A Spatial Analysis of the Israeli Military's Conduct in Gaza since October 2023* (15 October 2024); See also UNOSAT, *Gaza Strip Road Network Comprehensive Damage Assessment - August 2024* (9 September 2024), <https://unosat.org/products/3957>.

³⁵⁰ Forensic Architecture, *A Spatial Analysis of the Israeli Military's Conduct in Gaza since October 2023* (15 October 2024), p. 267.

³⁵¹ *Ibid*, p. 240 ff.

³⁵² *Ibid*, p. 333; See also, Forensic Architecture, *'No Traces of Life': Israel's Ecocide in Gaza 2023-2024* (29 March 2024), <https://forensic-architecture.org/investigation/ecocide-in-gaza>.

workers during frequent crises.”³⁵³ Throughout Gaza, “coastal areas, water, soil, . . . and the Wadi Gaza nature reserve, along with vital ecosystem services” have also been damaged or destroyed. 83 per cent of all plant life has been destroyed;³⁵⁴ while 93 per cent of the agriculture, forestry, and fishing economy has been destroyed.³⁵⁵ Groundwater, coastal water and surface water have been contaminated as waste-water management sites have been destroyed, as well as by munitions and chemicals. Gaza’s topography itself has been altered as well, as Israel has reconfigured the natural and built environment of the Gaza Strip.³⁵⁶ The rubble from agricultural infrastructure and of destroyed buildings left in agricultural areas has long-term effects that will likely render these areas toxic for cultivation for years to come.³⁵⁷ The debris left by bombardments is laced with almost 1 million tonnes of asbestos “as well as various other contaminants”;³⁵⁸ while destroyed facilities are “now leaking petrol and other hazardous materials.” All these factors are leading to “high levels of air, water, and land pollution to which people in Gaza are now exposed on a daily basis.”³⁵⁹

74. The effects of Israel’s destruction of Palestinian life in Gaza, in all its respects — social, cultural, economic, infrastructure, basic services, environmental — have been so extensive that Israel has rendered Gaza itself unrecognisable.³⁶⁰ Israel’s repeated patterns of social, cultural, infrastructure and economic destruction irreversibly affect all aspects of life in Gaza. They alter the structures that support the meaningful possibility of life in Gaza, and fundamentally diminish the ability of the protected group to survive, constitute and re-constitute itself.

F: The pattern of Israel’s forcible transfer and displacement of Palestinians in and out of Gaza

75. Since 7 October 2023, the situation in Gaza has been characterised by continuous mass expulsions of the traumatised, terrified population from cities and neighbourhoods across the Gaza Strip which Israel has subjected to intense and indiscriminate military bombardments, driving the displaced Palestinian people through “apocalyptic” landscapes to areas which have been repeatedly condemned as

³⁵³ UNCTAD, *Developments in the economy of the Occupied Palestinian Territory: Note by the UNCTAD secretariat*, TD/B/71/3 (23 July 2024), https://unctad.org/system/files?file=official-document/tdb71_d3_en.pdf, p. 7, para. 11.

³⁵⁴ See also, Forensic Architecture, *A Spatial Analysis of the Israeli Military’s Conduct in Gaza since October 2023* (15 October 2024), p. 40.

³⁵⁵ World Bank, *World Bank Economic Monitoring Report: Impacts of the Conflict in the Middle East on the Palestinian Economy* (May 2024), <https://thedocs.worldbank.org/en/doc/ce9fed0d3bb295f0363d690224d1cd39-0280012024/original/Palestinian-Econ-Upd-May2024-FINAL-ENGLISH-Only.pdf>, p. 6.

³⁵⁶ See also, Forensic Architecture, *A Spatial Analysis of the Israeli Military’s Conduct in Gaza since October 2023* (15 October 2024), p. 308.

³⁵⁷ *Ibid.*, p. 803; The World Bank, *World Bank Economic Monitoring Report: Impacts of the Conflict in the Middle East on the Palestinian Economy* (May 2024), <https://thedocs.worldbank.org/en/doc/ce9fed0d3bb295f0363d690224d1cd39-0280012024/original/Palestinian-Econ-Upd-May2024-FINAL-ENGLISH-Only.pdf>, p. 9; and United Nations Environmental Programme (‘UNEP’), *Environmental impact of the conflict in Gaza: Preliminary assessment of environmental impacts* (18 June 2024), https://wedocs.unep.org/bitstream/handle/20.500.11822/45739/environmental_impact_conflict_Gaza.pdf.

³⁵⁸ UN News, Global Perspective Human Stories, *Gaza at ‘most dangerous’ stage amid huge unexploded weapons risk, warns demining expert* (29 April 2024), <https://news.un.org/en/story/2024/04/1149126>; Nils Adler, “‘Death sentence’: Asbestos released by Israel’s bombs will kill for decades”, *Al Jazeera* (8 October 2024), <https://www.aljazeera.com/news/2024/10/8/death-sentence-asbestos-released-by-israels-bombs-will-kill-generations>.

³⁵⁹ The World Bank, the European Union and the UN, *Gaza Strip - Interim Damage Assessment: Summary Note - March 29, 2024* (29 March 2024), <https://thedocs.worldbank.org/en/doc/14e309cd34e04e40b90eb19afa7b5d15-0280012024/original/Gaza-Interim-Damage-Assessment-032924-Final.pdf>, p. 16.

³⁶⁰ UNRWA, @UNRWA, Tweet (5:40 pm, 5 February 2024), <https://x.com/UNRWA/status/1754530324783239532>; UNRWA, @UNRWA, Tweet (7:57 pm, 17 February 2024), <https://x.com/UNRWA/status/1758913569490424170>; Louise Wateridge, @UNWateridge, Tweet (6:53 pm, 17 August 2024), <https://x.com/UNWateridge/status/1824852107385602483>; and Louise Wateridge, @UNWateridge, Tweet (9:27 pm, 18 July 2024), <https://x.com/UNWateridge/status/1814019205676552316>.

“unsafe”,³⁶¹ and then repeatedly and deliberately targeting them. By November 2024, over 1.9 million Palestinian men, women and children have been displaced with nowhere safe to go,³⁶² as Israel intensified its attacks on “humanitarian zones.” Israel’s unilateral declarations of “safe zones” without adequate infrastructure and without effective coordination with the United Nations and other international organisations,³⁶³ its systematic destruction of the shelters, schools and hospitals for the displaced, and its deliberate expulsion of critically ill patients and displaced Palestinians from hospitals, has left desperate fleeing and vulnerable Palestinians in Gaza with “nowhere safe” to go,³⁶⁴ “they live through the unlivable”,³⁶⁵ “witnessing daily threats to their very existence.”³⁶⁶ Civilians unable to evacuate are targeted by Israel as “accomplices in a terrorist organisation”,³⁶⁷ while the displaced have been attacked and killed in the very “safe corridors” in which they were ordered to flee,³⁶⁸ and those attempting to return to their homes have been killed.³⁶⁹

76. The evidence shows that there is no safe passage and no safe refuge in Gaza. Palestinians have been ordered to leave their homes and shelters, through airdropped leaflets, social media posts, phone calls, and on drones with loudspeakers,³⁷⁰ and ordered to walk long distances. Witnesses recount receiving calls from the Israeli military, informing them that they had 15 minutes to evacuate before the bombing.

³⁶¹ UN News, *Tens of thousands displaced in new Gaza City escalation* (1 July 2024), <https://news.un.org/en/story/2024/07/1151651#>; and UN OHCHR, *Israeli authorities, Palestinian armed groups are responsible for war crimes, other grave violations of international law, UN Inquiry finds* (12 June 2024), <https://www.ohchr.org/en/press-releases/2024/06/israeli-authorities-palestinian-armed-groups-are-responsible-war-crimes>.

³⁶² UN OCHA, *Reported impact snapshot | Gaza Strip (19 November 2024)* (19 November 2024), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-19-november-2024>.

³⁶³ UNDP, *Humanitarian chiefs will not take part in unilateral proposals to create “safe zones” in Gaza - Statement by Principals of the Inter-Agency Standing Committee* (16 November 2023), <https://www.undp.org/speeches/humanitarian-chiefs-will-not-take-part-unilateral-proposals-create-safe-zones-gaza-statement-principals-inter-agency-standing-committee>; see also *South Africa v. Israel, Written comments of South Africa on the reply of the State of Israel to the question put by Judge Nolte at the public sitting held on 17 May 2024* (20 May 2024), <https://www.icj-cij.org/sites/default/files/case-related/192/192-20240520-oth-01-00-en.pdf>.

³⁶⁴ UNICEF, *There is ‘nowhere safe to go’ for the 600,000 children of Rafah, warns UNICEF* (6 May 2024), <https://www.unicef.org/press-releases/there-nowhere-safe-go-600000-children-rafah-warns-unicef>.

³⁶⁵ UNRWA, *The Gaza Strip: 100 days of death, destruction and displacement, Statement by Philippe Lazzarini, Commissioner-General of UNRWA* (13 January 2024), <https://www.unrwa.org/newsroom/official-statements/gaza-strip-100-days-death-destruction-and-displacement>.

³⁶⁶ UN OCHA, *UN relief chief: The war in Gaza must end, Statement by Martin Griffiths, Under-Secretary-General for Humanitarian Affairs and Emergency Relief Coordinator* (5 January 2024), <https://www.unocha.org/news/un-relief-chief-war-gaza-must-end>.

³⁶⁷ Al Mezan, *Urgent international intervention is needed to protect Palestinians in northern Gaza* (22 October 2023), <https://mezan.org/en/post/46299>.

³⁶⁸ UN HRC, *Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel, Detailed findings on the military operations and attacks carried out in the Occupied Palestinian Territory from 7 October to 31 December 2023, A/HRC/56/CRP.4* (10 June 2024), <https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session56/a-hrc-56-crp-4.pdf>, p. 27, para. 110.

³⁶⁹ UN OCHA, *Hostilities in the Gaza Strip and Israel | Flash Update #49* (24 November 2023), <https://www.unocha.org/publications/report/occupied-palestinian-territory/hostilities-gaza-strip-and-israel-flash-update-49>.

³⁷⁰ Forensic Architecture Report, *Humanitarian Violence: Israel’s Abuse of Preventative Measures in its 2023-2024 Genocidal Military Campaign in the Occupied Gaza Strip* (7 March 2024), https://content.forensic-architecture.org/wp-content/uploads/2024/03/Humanitarian-Violence_Report_FA.pdf, p. 3.

77. Palestinians fleeing along “safe corridors” have been stopped at checkpoints,³⁷¹ stripped, arrested, attacked, disappeared and killed³⁷² — vehicles have been shelled killing evacuating civilians on the Salah Ad Din road.³⁷³ Hospitals sheltering displaced men, women and children, have been attacked and besieged, displaced men stripped to their underwear and taken away. The displaced are ordered to evacuate into areas where hostilities are still ongoing,³⁷⁴ such that the displaced population has no possibility of escape — effectively locked into a territory under military siege, administratively curtailed by Israel’s permit system and movement restrictions,³⁷⁵ and geographically fragmented.
78. A hallmark of the displacements is the funnelling of the fleeing population in Gaza into ever shrinking slivers of territory, into inhumane and unsafe living conditions, thwarting the ability of the group to reconstitute itself.³⁷⁶ For example, over one million Palestinians were expelled from Gaza City and the entire North of Gaza, to the Middle Area in Khan Younis and Deir Al-Balah, and then from the Middle Area to the South, to Rafah to a sprawling squalid “tent city” — “the gates to a living nightmare.”³⁷⁷ In May 2024 evacuation orders forced 800,000 displaced Palestinians from Rafah back to Khan Younis, Deir Al-Balah and Al Mawasi.³⁷⁸ The catalogue of multiple mass displacements of traumatised vulnerable families to areas that are “uninhabitable”³⁷⁹ was condemned by United Nations agencies as “an unbearable escalation”,³⁸⁰ that would lead to “a bloodbath”,³⁸¹ making the already catastrophic situation in Gaza “impossible” and unthinkable.³⁸² Along with the safe zones and safe

³⁷¹ UN HRC, *Report of the Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel*, A/HRC/56/26 (14 June 2024), <https://digitallibrary.un.org/record/4051243?v=pdf>, p. 12, para. 59.

³⁷² UN OCHA, *Hostilities in the Gaza Strip and Israel | Flash Update #47* (22 November 2023), <https://www.ochaopt.org/content/hostilities-gaza-strip-and-israel-flash-update-47>; UN HRC, *Detailed findings on the military operations and attacks carried out in the Occupied Palestinian Territory from 7 October to 31 December 2023*, A/HRC/56/CRP.4 (10 June 2024), <https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session56/a-hrc-56-crp-4.pdf>, paras. 367-372.

³⁷³ UN HRC, *Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel, Detailed findings on the military operations and attacks carried out in the Occupied Palestinian Territory from 7 October to 31 December 2023*, A/HRC/56/CRP.4 (10 June 2024), <https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session56/a-hrc-56-crp-4.pdf>, pp. 27-28.

³⁷⁴ UN, *The Question of Palestine, Statement by the UN Humanitarian Coordinator for the Occupied Palestinian Territory, Lynn Hastings, on the protection of all civilians in Gaza* (26 October 2023), <https://www.un.org/unispal/document/statement-by-the-un-humanitarian-coordinator-for-the-occupied-palestinian-territory-lynn-hastings-on-the-protection-of-all-civilians-in-gaza/>.

³⁷⁵ Gisha, *The Permit Regime: Testimonies Palestinian residents of Gaza attest to the bureaucratic violence inherent in Israel’s permit regime* (28 July 2022), <https://gisha.org/en/the-permit-regime-testimonies/>.

³⁷⁶ *Krstić Appeal Judgment*, para. 31.

³⁷⁷ Philippe Lazzarini, @UNLazzarini, Tweet (1:52 pm, 10 February 2024), <https://twitter.com/UNLazzarini/status/1756285108405821767?s=20>; UN News, *Nine killed in direct hit on UNRWA shelter in Gaza* (24 January 2024), <https://news.un.org/en/story/2024/01/1145837>; and UN OHCHR, *UN Human Rights Chief visits Rafah border crossing with Gaza* (8 November 2023), <https://www.ohchr.org/en/statements-and-speeches/2023/11/un-human-rights-chief-visits-rafah-border-crossing-gaza>.

³⁷⁸ UN News, *Gaza: Nearly 800,000 now displaced from Rafah* (18 May 2024), <https://news.un.org/en/story/2024/05/1149951#>.

³⁷⁹ Mercy Corps, *Catastrophe Imminent for 1.5 Million Gazans as Rafah Evacuation Orders Begin* (6 May 2024), <https://europe.mercycorps.org/en-gb/press-room/releases/rafah-evacuation-order>.

³⁸⁰ UN Women, *Intensified military operations will bring increased death and despair for Rafah’s 700,000 women and girls* (6 May 2024), <https://www.unwomen.org/en/news-stories/press-release/2024/05/intensified-military-operations-will-bring-increased-death-and-despair-for-rafahs-700000-women-and-girls>.

³⁸¹ WHO, *Rafah incursion would substantially increase mortality and morbidity and further weaken an already broken health system* (3 May 2024), <https://www.who.int/news/item/03-05-2024-rafah-incursion-would-substantially-increase-mortality-and-morbidity-and-further-weaken-an-already-broken-health-system>.

³⁸² Global Protection Cluster, *Civilians Lives on the Line: Risks of Further Harm and Severe Suffering with Potential Rafah Incursion* (3 May 2024), <https://www.globalprotectioncluster.org/index.php/publications/1854/communication-materials/speech-statement/opt-protection-cluster-global-protection>.

corridors for the displaced,³⁸³ hospitals, schools and UNRWA shelters housing the displaced have also been targeted and attacked. By 18 November 2024, 464 incidents affected UNRWA shelters, killing 563 displaced Palestinians and injuring 1,790,³⁸⁴ along with 563 attacks on healthcare, killing 838 and injuring 1,219 Palestinians,³⁸⁵ and attacks on 564 schools — a “pattern” affecting 70 percent of UNRWA schools sheltering displaced Palestinians in Gaza.³⁸⁶

79. Israel’s scorched earth policy in Gaza is preventing displaced Palestinians from returning. In areas where mass evacuations have been ordered, Israel has reduced entire neighbourhoods to rubble and Israel’s systematic destruction of the road network is also preventing the return of displaced Palestinians, as is Israel’s razing of Palestinian homes, and complete destruction of the territory.³⁸⁷ Its carving up of the landscape with new dividing roads, expanded buffer zones, and checkpoints has caused harm of such a serious nature as to threaten the group’s destruction.³⁸⁸
80. With those measures, Israel has effectively uprooted almost the entirety of the population of Gaza from their homes and communities, while at the same time destroying the fabric of these communities, their homes, means of sustenance and infrastructure and denying them access to basic needs to reduce them to the most vulnerable state.

G: Israel’s practice of complete disregard for the laws of war

81. Israel’s systematic and sustained lack of compliance with the most basic rules of international humanitarian law³⁸⁹ is further evidence of a breach of Article II of the Genocide Convention in three respects. First, Israel’s failure to significantly ameliorate its conduct in the face of the ICJ’s three Provisional Measures Orders³⁹⁰ confirms its willingness to treat Palestinians inhumanely despite the Court’s Orders demanding that such humanity be respected. Second, the catastrophic, well-documented and escalating

³⁸³ Forensic Architecture, *A Spatial Analysis of the Israeli Military’s Conduct in Gaza since October 2023* (15 October 2024), <https://forensic-architecture.org/investigation/a-cartography-of-genocide>, p. 520; Forensic Architecture, *Inhumane Zones: An assessment of Israel’s actions with respect to the provision of aid, shelter, safe passage, and assistance to evacuees in Gaza: response to questions raised in the ICJ on 17 May 2024* (19 May 2024), https://content.forensic-architecture.org/wp-content/uploads/2024/05/Inhumane-Zones-Report-Forensic-Architecture_WEBSITE.pdf, p. 28 ff.

³⁸⁴ UNRWA, *UNRWA Situation Report #148 on the Humanitarian Crisis in the Gaza Strip and the West Bank, including East Jerusalem* (20 November 2024), <https://www.unrwa.org/resources/reports/unrwa-situation-report-148-situation-gaza-strip-and-west-bank-including-east-jerusalem>.

³⁸⁵ WHO, *oPt Emergency Situation Update, 7 Oct 2023-13 Nov 2024* (13 November 2024), https://www.emro.who.int/images/stories/Sitrep_50b.pdf.

³⁸⁶ Al Jazeera English, @AJEnglish, Tweet (9:28 am, 14 August 2024), <https://x.com/AJEnglish/status/1823622785618350134>; UNRWA @UNRWA, Tweet (9:12 am, 9 August 2024), <https://x.com/UNRWA/status/1821806735226741013>.

³⁸⁷ United Nations Institute for Training and Research (“UNITAR”), *UNOSAT Gaza Strip Comprehensive Building & Housing Unit Damage Assessment* (20 March 2024), <https://unosat.org/products/3804>; UN OHCHR, *Update Report: Six-month update report on the human rights situation in Gaza: 1 November 2023 to 30 April 2024* (8 November 2024), <https://www.ohchr.org/sites/default/files/documents/countries/opt/20241106-Gaza-Update-Report-OPT.pdf>, p. 24, para. 54; Forensic Architecture, *A Spatial Analysis of the Israeli Military’s Conduct in Gaza since October 2023* (15 October 2024), https://content.forensic-architecture.org/wp-content/uploads/2024/10/FA_A-Spatial-Analysis-of-the-Israeli-militarys-conduct-in-Gaza-since-October-2023.pdf, pp. 565-590.

³⁸⁸ Forensic Architecture, *Humanitarian Violence: Israel’s Abuse of Preventative Measures in its 2023-2024 Genocidal Military Campaign in the Occupied Gaza Strip* (7 March 2024), https://content.forensic-architecture.org/wp-content/uploads/2024/03/Humanitarian-Violence_Report_FA.pdf, p. 12 - 13; Forensic Architecture, *No Traces of Life: Israel’s Ecocide in Gaza 2023-2024* (29 March 2023), <https://forensic-architecture.org/investigation/ecocide-in-gaza>; *Application of the Convention on the Prevention and Punishment of the Crime of Genocide* (‘Croatia v. Serbia’), *Judgment*, I.C.J. Reports 2015, p. 3, para. 157.

³⁸⁹ *Ibid*, <https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session56/a-hrc-56-crp-4.pdf>, pp. 108-110 and pp. 113-115, paras. 429-430, 434, 440, 451 and 459. See also UN HRC, *Human rights situation in the Occupied Palestinian Territory, including East Jerusalem, and the obligation to ensure accountability and justice: Report of the United Nations High Commissioner for Human Rights*, A/HRC/55/28 (4 March 2024), <https://documents.un.org/doc/undoc/gen/g24/023/38/pdf/g2402338.pdf>, p. 15, paras. 87 and 90.

³⁹⁰ *South Africa v. Israel*, Provisional Measures Order of 26 January 2024, p. 24, para. 85.

human cost for the people of Palestine that has resulted from Israel denying them *as a group* the fundamental protections guaranteed under international humanitarian law, including the law of occupation, is consistent with the total dehumanisation of a people implicit in and necessary for the commission of genocide.³⁹¹ Third, the *manner* in which Israel has systematically violated international humanitarian law in the Gaza Strip since 7 October 2023 illustrates its contempt for the protections these rules provide, and reveals a pattern of inverting these protections into an index of vulnerabilities on the part of the Palestinians in Gaza, which are then systematically preyed on by Israel. This instrumentalisation of international humanitarian law to genocidal ends can be seen in both the manner in which Israel has carried out its military offensive (including through the use of evacuations and “safe zones”; and through its bombing campaign), as well as the manner in which it has denied, withdrawn and undermined the provision by others of the basic needs of the occupied population as indexed in the Fourth Geneva Convention.

82. Israel’s most egregious violations of international humanitarian law, a number of which were recorded by the United Nations Commission of Inquiry,³⁹² include: (i) The failure to distinguish between those whom — it claims — it is fighting a war against, and the Palestinian civilian population of Gaza; (ii) The failure to observe precaution and proportionality in attacks; (iii) The manifest violation of its obligations towards the occupied Palestinian population as an Occupying Power; (iv) The failure to guarantee the special protection due to certain categories of individuals and objects which it, instead, attacked systematically and relentlessly (humanitarian personnel; medical personnel; children, women, sick/wounded, and disabled; journalists; humanitarian organisations’ offices; hospitals; shelters, etc.); (v) The repeated and continuous displacement of the Palestinian population; (vi) The systematic commission of war crimes against Palestinians; and (vii) The breach of its obligations to respect and ensure respect for international humanitarian law.³⁹³
83. Instead of complying with its obligations under international humanitarian law, Israel has sought to (re)interpret those obligations in such a way as to both *enable* and *camouflage* its breaches of the Genocide Convention. The instrumentalisation of international humanitarian law by Israel has included the following:
84. **Human Shields:** Israel extends the international law concept of human shield — which relates exclusively to the intentional co-location of military objectives and civilians or persons *hors de combat* to prevent the targeting of those military objectives — to the mere fact that civilians may be located in the same building or in close proximity to one or more militants. For Israel, the entire residents of an apartment block — or indeed a refugee camp — are then somehow transformed into

³⁹¹ See *Palestine Advisory Opinion*; Addameer et al., *Israeli Apartheid Tool of Zionist Settler Colonialism* (2022), https://www.alhaq.org/cached_uploads/download/2022/12/22/israeli-apartheid-web-final-1-page-view-1671712165.pdf; UN OHCHR, *Apartheid Israel is targeting Gaza and the West Bank simultaneously, says expert* (2 September 2024), <https://www.ohchr.org/en/press-releases/2024/09/apartheid-israel-targeting-gaza-and-west-bank-simultaneously-says-expert>; UN OHCHR, *Occupied Gaza Strip: UN Committee calls for immediate ceasefire and urges end to hate speech amid fears of broader conflict* (27 October 2023), <https://www.ohchr.org/en/press-releases/2023/10/occupied-gaza-strip-un-committee-calls-immediate-ceasefire-and-urges-end#:~:>; UNGA, *Situation of human rights in the Palestinian territories occupied since 1967*, A/77/356 (21 September 2022), <https://documents.un.org/doc/undoc/gen/n22/598/03/pdf/n2259803.pdf>, p. 5.

³⁹² 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*, A/HRC/56/CRP.4 (10 June 2024), <https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session56/a-hrc-56-crp-4.pdf>, paras. 429–30, 434, 440–441, 451 and 459; UNGA, *Report of the Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel*, A/79/232 (11 September 2024), <https://documents.un.org/doc/undoc/gen/n24/262/79/pdf/n2426279.pdf>, paras. 88–110.

³⁹³ See, generally, Fourth Geneva Convention (IV) relative to the protection of civilian persons in time of war, Art. 1; ICRC, Customary Law Study, Rules 139 and 144.

targeting of combatants, and civilians only where they are directly participating in hostilities *and only for such time as they are directly participating*.

86. ***Distinction, Military Necessity and Proportionality:*** While international humanitarian law requires the concrete and direct military advantage expected from a single attack to be balanced against the foreseeable incidental harm to civilians and civilian objects; Israel's stated position is that this concrete and direct "military advantage may include a variety of operational considerations such as disrupting enemy activities, weakening the enemy's military forces, gaining ground, and protecting the security of one's own forces and civilians." Most notably, it adds that "[M]ilitary advantage moreover may refer to the advantage anticipated from an operation as a whole."⁴⁰⁰ With such a contortion of the law of armed conflict, there is no limit to the number of dead Palestinians that can be 'accommodated' in pursuit of a broadly defined military objective or how much of Gaza can be destroyed in its name.⁴⁰¹
87. ***The use of evacuation orders:*** Israel has instrumentalised international humanitarian law to destroy Palestinians in Gaza through its use of evacuation orders in order to inflict killing, harm and conditions unfit for survival on Palestinians in Gaza. Israel has repeatedly used the promise of ostensible protection under the rules of international humanitarian law in order to corral Palestinian families into densely populated "safe areas" which are then attacked indiscriminately,⁴⁰² oftentimes with "dumb bombs" (a bomb that is neither powered nor guided) and depends on accurate dropping on the target for its effectiveness) and 1000 or 2000-pound bombs, causing maximal destruction as population density increased.⁴⁰³ Israel's use of this cynical and endless 'evacuation' practice, under which "the constant need for safer locations [results] ... in

⁴⁰⁰ Israeli Ministry of Foreign Affairs, *Hamas-Israel Conflict 2023: Key Legal Aspects* (2 November 2023), [https://www.gov.il/BlobFolder/news/hamas-israel-conflict2023-key-legal-aspects/en/English_Documents_Hamas-Israel_Conflict_2023_-_Some_Factual_and_Legal_Aspects_-_Israel_Ministry_of_Foreign_Affairs_\(2_NOV_2023\).pdf](https://www.gov.il/BlobFolder/news/hamas-israel-conflict2023-key-legal-aspects/en/English_Documents_Hamas-Israel_Conflict_2023_-_Some_Factual_and_Legal_Aspects_-_Israel_Ministry_of_Foreign_Affairs_(2_NOV_2023).pdf), p. 10.

⁴⁰¹ See UN HRC, *Detailed findings on the military operations and attacks carried out in the Occupied Palestinian Territory from 7 October to 31 December 2023*, A/HRC/56/CRP.4 (10 June 2024), <https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session56/a-hrc-56-crp-4.pdf>, p. 37, paras. 154-156.

⁴⁰² See also UN OHCHR, *Update Report: Six-month update report on the human rights situation in Gaza: 1 November 2023 to 30 April 2024* (8 November 2024), <https://www.ohchr.org/sites/default/files/documents/countries/opt/20241106-Gaza-Update-Report-OPT.pdf>, pp. 23-24: "Given Israel's continued willingness to strike what it considered to be military targets within 'safe zones', its unilateral declaration of 'safe zones' was understood by many civilians seeking shelter there as conferring much greater protection than it, in fact, did. To the extent that Israel reserved the right to strike military targets within these areas, the 'safe zones' did not provide appreciably greater protection to civilians there than outside, and indeed may have placed the high concentrations of civilians there at greater risk than they would have been outside these zones . . . Monitoring by OHCHR raises concerns that Israel has consistently failed to meet these conditions [for an evacuation ordered to be lawful under IHL], and has instead created a concentration of highly vulnerable civilians effectively in areas of active hostilities, as the examples of Deir al Balah and Tall as Sultan above demonstrate."

⁴⁰³ Forensic Architecture, *Humanitarian Violence: Israel's Abuse of Preventative Measures in its 2023-2024 Genocidal Military Campaign in the Occupied Gaza Strip* (7 March 2024), https://content.forensic-architecture.org/wp-content/uploads/2024/03/Humanitarian-Violence_Report_FA.pdf, pp. 58 - 65; Robin Stein, Haley Willis et al., "A Times Investigation Tracked Israel's Use of One of Its Most Destructive Bombs in South Gaza", *The New York Times* (21 December 2023), <https://www.nytimes.com/2023/12/21/world/middleeast/israel-gaza-bomb-investigation.html>; Palestinian Centre for Human Rights ('PCHR'), Al Mezan Center for Human Rights ('Al Mezan') and Al-Haq, *Israeli Occupying Forces' Targeted Killing of Palestinians Displaced in Tents in al-Mawasi Khan Younis Perpetuates Crime of Genocide* (10 March 2024), <https://pchrgaza.org/en/israeli-occupying-forces-targeted-killing-of-palestinians-displaced-in-tents-in-al-mawasi-khan-younis-perpetuates-crime-of-genocide/>; "There is no safe place in Gaza", *Palestinian Centre for Human Rights* (4 May 2024), https://www.youtube.com/watch?v=X6_ugDRXXu0; See also PCHR, *Testimonies from War on Gaza: Mayar alshakhbir* (9 March 2024), <https://pchrgaza.org/en/testimonies-from-war-on-gaza-mayar-alshakhbir/>; NBC Nightly News with Lester Holt, @NBCNightlyNews, Tweet (1:26 am, 27 April 2024), <https://twitter.com/NBCNightlyNews/status/1784001112124932600>. See also Amnesty International, *Israel/OPT: New evidence of unlawful Israeli attacks in Gaza causing mass civilian casualties amid real risk of genocide* (12 February 2024), <https://www.amnesty.org/en/latest/news/2024/02/israel-opt-new-evidence-of-unlawful-israeli-attacks-in-gaza-causing-mass-civilian-casualties-amid-real-risk-of-genocide/>; Forensic Architecture, *A Spatial Analysis of the Israeli Military's Conduct in Gaza since October 2023* (15 October 2024), p. 817 ff.

people being displaced multiple times”,⁴⁰⁴ is itself genocidal: causing “serious bodily and mental harm”⁴⁰⁵ (especially to children)⁴⁰⁶ and “deliberately inflicting on the group conditions of life calculated to bring about its physical destruction.”⁴⁰⁷

88. **Disproportionate attacks and attacks without precaution:** For those attacks of which Israel can plausibly claim they had a military objective, the attacks’ lack of proportionality and Israel’s failure to provide precaution indicate Israel’s abuse of a supposedly “lawful target” in order to achieve maximal loss of Palestinian life, damage and destruction.⁴⁰⁸ For example, as indicated by data from Airwars, on 25 October 2023, Israel attacked the Al Taj building and surrounding areas, killing at least 101 people, including 44 children and 37 women, and injuring “hundreds” of others.⁴⁰⁹ The Israeli military was said to have described its strikes as targeting a “ Hamas terror tunnel,” without further details.⁴¹⁰ No precaution was provided.⁴¹¹ Overall, Airwars’ data found that for the period of October 2023 only, there were only 26 out of 606 killings by the Israeli military investigated in which it found evidence of militant activity. Of those, an average of 20 civilians were killed, including at least 11 children, and one militant, per incident.⁴¹² These and other strikes led the Commission of Inquiry to conclude, amongst other things, that (a) “[i]n most cases reviewed, the Commission did not receive any credible evidence of the civilian object in question being a legitimate military target” and (b) “for all incidents it investigated of attacks that led to civilian casualties, that such attacks were in clear violation of the principle of proportionality, even if legitimate military targets were present on the scene and were killed in the attacks.”⁴¹³
89. **Abuse of its control and authority as an Occupying Power:** Israel extensively violated international humanitarian law by its persistent breach of almost every fundamental rule applicable to the conduct of an Occupying Power during a belligerent occupation, and *essential* to the protection of the basis for Palestinian life in Gaza. The law of occupation lays down the bare minimum conduct vis-à-vis the

⁴⁰⁴ UNRWA, *UNRWA Situation Report #76 on the situation in the Gaza Strip and the West Bank, including East Jerusalem* (12 February 2024), <https://www.unrwa.org/resources/reports/unrwa-situation-report-76-situation-gaza-strip-and-west-bank-including-east-jerusalem#>.

⁴⁰⁵ *Prosecutor v. Radislav Krstic*, Trial Chamber, Judgment (2 August 2001), IT-98-33-T, (‘Krstic Trial Judgment’), p. 180, para. 509.

⁴⁰⁶ Save the Children International, *Trapped and Scarred: The compounding mental harm inflicted on Palestinian children in Gaza* (2024), <https://resourcecentre.savethechildren.net/pdf/Trapped-and-Scarred-Final-1-1.pdf>, pp. 7 - 8.

⁴⁰⁷ See e.g. *Bosnia v Serbia*, pp. 64, 82 and 84, paras. 143, 186 and 190.

⁴⁰⁸ UN OHCHR, *Thematic Report: Indiscriminate and disproportionate attacks during the conflict in Gaza (October – December 2023)* (19 June 2024), <https://www.ohchr.org/sites/default/files/documents/countries/opt/20240619-ohchr-thematic-report-indiscrim-disprop-attacks-gaza-oct-dec2023.pdf>, pp. 14 - 16.

⁴⁰⁹ Airwars, *Civilian Casualties – Airwars assessment, ISPT0587* (25 October 2023), <https://airwars.org/civilian-casualties/ispt0587-october-25-2023/>.

⁴¹⁰ *Ibid.*

⁴¹¹ *Ibid.*; See also Airwars, *The Killings They Tweeted: An Airwars Investigation* (9 October 2024), <https://idf-tweets-gaza.airwars.org/> [6:36-11:46]; See also Sky News’ Data and Forensics Unit, “Israel has published hundreds of airstrike videos - but they only tell part of the story”, *Sky News* (9 October 2024), <https://news.sky.com/story/israel-has-published-hundreds-of-airstrike-videos-but-they-only-tell-part-of-the-story-13225758>.

⁴¹² Airwars, *Civilian Harm Analysis: Gaza, October 2023* (October 2024), <https://airwars.org/research/civilian-harm-patterns-gaza-october-2023/>, Annex-1: Patterns of Death, Counting Militant Deaths: “26 incidents out of 606 incidents included evidence of Hamas casualties. A minimum of 522 civilians were killed in these incidents, and between 32 and 60 militants . . . Per incident where there was evidence of militants, an average of 20 civilians were killed at a minimum, and 11 children. Each case recorded on average one militant death.”

⁴¹³ 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*, A/HRC/56/CRP.4 (10 June 2024), <https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session56/a-hrc-56-crp-4.pdf>, pp. 107 and 108, paras. 422 and 425.

occupied population any Occupying Power must observe, for as long as its occupation is maintained.⁴¹⁴

90. ***Israel's further dehumanising conduct in violation of international humanitarian law*** Multiple investigations have demonstrated Israel's regular desecration of cemeteries in Gaza,⁴¹⁵ and other outrages upon dead bodies:⁴¹⁶ Israel has removed Palestinian bodies from cemeteries in Gaza — which it has admitted to.⁴¹⁷
91. Israel's abandonment of the law has been nurtured through the accompanying long years of comprehensive impunity in respect of those violations.⁴¹⁸ This long and profound history of violations and impunity further evidences the extensive and long-term dehumanisation of the Palestinian population under Israel's control; and has contributed to creating the genocidal mindset that is now reflected in Israel's conduct towards the Palestinian population of Gaza.

H: Israel's failure to distinguish between civilians and those actively involved in hostilities

92. The principle of distinction means that the parties to an armed conflict must at all times distinguish between civilians and combatants and that attacks may only be directed against combatants (not civilians).⁴¹⁹ Once the requirement of distinction is removed from the foundations of international humanitarian law, the entire structure of protection that it intends to provide collapses. Those presenting no security threat to the aggressor are then denied the benefit of their basic humanity and all members of the opposite population are made liable to attack.
93. Israel has systematically, massively, and entirely disregarded the principle of distinction. It has indiscriminately bombed and killed civilians and civilian infrastructures all through Gaza. It has flattened civilian neighbourhoods and destroyed almost all civilian infrastructure — such as schools, hospitals, ambulances, shelters, mosques and churches. These all reflect not just Israel's failure of distinction but its failure to take constant care to spare the civilian population, civilians, and civilian objects and that all precautions are taken to avoid and minimise incidental loss of civilian life, injury to civilians and damage to civilian objects.⁴²⁰
94. This policy of non-distinguishing conduct coupled with dehumanising rhetoric was clear from the outset: on 9 October 2023, Defence Minister Yoav Gallant in an Israeli military 'situation update' advised that Israel was "imposing a complete siege on Gaza. No electricity, no food, no water, no fuel. Everything is closed. We are fighting human

⁴¹⁴ *Legal Consequences Arising from the Policies and Practices of Israel in the Occupied Palestinian Territory, Including East Jerusalem, Advisory Opinion, I.C.J. Reports 19 July 2024 ('Palestine Advisory Opinion')*, p. 72, para. 264.

⁴¹⁵ Jeremy Diamond *et al.*, "At least 16 cemeteries in Gaza have been desecrated by Israeli forces, satellite imagery and videos reveal", *CNN* (20 January 2024), <https://www.cnn.com/2024/01/20/middleeast/israel-gaza-cemeteries-desecrated-investigation-intl-cmd/index.html>; In relation to Israeli army claims, see also Jeremy Diamond, "Israel claims a tunnel ran through this Gaza cemetery it destroyed. A visit to the site raised more questions than answers", *CNN* (29 January 2024), <https://edition.cnn.com/2024/01/29/world/israel-cemetery-bani-suheila-intl/index.html>; See also Bellingcat, *Analysis Reveals Damage and Destruction of Cultural Heritage Sites in Gaza* (26 June 2024), <https://www.bellingcat.com/news/2024/06/26/gaza-israel-destroy-destruction-damage-cultural-history-heritage-archaeology-conflict-war/> [10:00-10:37].

⁴¹⁶ Fourth Geneva Convention, Art. 16 (2); See also ICRC, Customary Law Study, Rule 113.

⁴¹⁷ Jeremy Diamond *et al.*, "At least 16 cemeteries in Gaza have been desecrated by Israeli forces, satellite imagery and videos reveal", *CNN* (20 January 2024), <https://www.cnn.com/2024/01/20/middleeast/israel-gaza-cemeteries-desecrated-investigation-intl-cmd/index.html>; See also "Israel returns 'decomposed' bodies of 89 Palestinians to Gaza", *Al Jazeera* (5 August 2024), <https://www.aljazeera.com/news/2024/8/5/israel-returns-decomposed-bodies-of-89-palestinians-to-gaza>.

⁴¹⁸ See below pattern J: The pattern of impunity for the perpetrators of crimes committed in pursuance of Israel's other identified patterns of atrocity.

⁴¹⁹ ICRC, Customary Law Study, Rule 1.

⁴²⁰ *Ibid*, Rules 7 and 15.

animals and we are acting accordingly.”⁴²¹ Since then, South Africa has shown in its previous filings with the United Nations Security Council in May 2024⁴²² — and now updated in Annexes I, II and III — that such statements have been repeated countless times, while the indiscriminate attacks on the civilian population have expanded in degree and kind. Similarly, the refrain that there are “no uninvolved” in Gaza has been established as a mantra at all levels of civilian and military arms of Israel.

95. The dehumanising and genocidal rhetoric of the civilian and military arms of Israel has occurred alongside the indiscriminate patterns of conduct, including “heavy bombardments, indiscriminate attacks using explosive weapons with wide-area effects in populated areas, collective punishment and obstruction of humanitarian aid” and “the pattern of Israeli attacks that target or impact civilian infrastructure leading to a catastrophic humanitarian crisis in the occupied Gaza Strip.”⁴²³ Israel has systematically engaged in airstrikes violating the principle of distinction,⁴²⁴ and the prohibition on indiscriminate attacks.⁴²⁵ Its ground troops and drones have attacked Palestinian civilians, in violation of the principle of distinction.⁴²⁶ Israeli soldiers have indicated their positions on the (ir)relevance of the principle of distinction to Gaza, explaining that they “realized that there are no mere civilians in Gaza, there are

⁴²¹ “We are dealing with human animals – and we are behaving accordingly. We are laying siege to Gaza city”, The Knesset Channel (9 October 2023), <https://www.youtube.com/watch?v=1nxvS9VY-t0>; Translation in Emanuel Fabian, “Defense minister announces ‘complete siege’ of Gaza: No power, food or fuel”, *The Times of Israel* (9 October 2023), https://www.timesofisrael.com/liveblog_entry/defense-minister-announces-complete-siege-of-gaza-no-power-food-or-fuel/.

⁴²² Tauriq Moosa, “SA’s dossier to UN Security Council of alleged genocide by Israel made public”, *Business Day* (30 June 2024), <https://www.businesslive.co.za/bd/national/2024-06-30-sas-dossier-to-un-security-council-of-alleged-genocide-by-israel-made-public/>.

⁴²³ The Committee on the Elimination of Racial Discrimination (‘CERD’), *Prevention of Racial Discrimination, including Early Warning and Urgent Action Procedure* (21 December 2023), https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=INT%2FCERD%2FEWU%2F9942&Lang=en, p. 2.

⁴²⁴ ICRC, Customary Law Study, Rule 1, Rule 2 and Rule 7; See also Convention (IV) respecting the Laws and Customs of War on Land and its annex: Regulations concerning the Laws and Customs of War on Land (18 October 1907) (‘Hague Regulations’), Art. 25; Fourth Geneva Convention, Art. 33. For violations, see: 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*, A/HRC/56/CRP.4 (10 June 2024), <https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session56/a-hrc-56-crp-4.pdf>, pp. 43 - 44, paras. 183 - 188. See also e.g. “لبنان غطية مبررة من جنونية شرا متعمد لاجترة”، *Al Jazeera Arabic* (21 March 2024), <https://www.youtube.com/watch?v=XsOCJwADWJw&rc=1>.

⁴²⁵ ICRC, Customary Law Study, Rule 11 and Rule 12; For violations, see: UN OHCHR, *Thematic Report: Indiscriminate and disproportionate attacks during the conflict in Gaza (October – December 2023)* (19 June 2024), <https://www.ohchr.org/sites/default/files/documents/countries/opt/20240619-ohchr-thematic-report-indiscrim-disprop-attacks-gaza-oct-dec2023.pdf>; Amnesty International, *Damning evidence of war crimes as Israeli attacks wipe out entire families in Gaza* (20 October 2023), <https://www.amnesty.org/en/latest/news/2023/10/damning-evidence-of-war-crimes-as-israeli-attacks-wipe-out-entire-families-in-gaza/>; Amnesty International, *Israel/OPT: Israeli air strikes that killed 44 civilians further evidence of war crimes – new investigation* (27 May 2024), <https://www.amnesty.org/en/latest/news/2024/05/israel-opt-israeli-air-strikes-that-killed-44-civilians-further-evidence-of-war-crimes-new-investigation/>; Amnesty International, *Israel/OPT: US-made munitions killed 43 civilians in two documented Israeli air strikes in Gaza – new investigation* (5 December 2023), <https://www.amnesty.org/en/latest/news/2023/12/israel-opt-us-made-munitions-killed-43-civilians-in-two-documented-israeli-air-strikes-in-gaza-new-investigation/>.

⁴²⁶ Human Rights Watch (‘HRW’), *Gaza: Israeli Forces Open Fire While Storming Home* (8 August 2024), <https://www.hrw.org/news/2024/08/08/gaza-israeli-forces-open-fire-while-storming-home>; PCHR, *Aysha Mousa Al-Najjar had her son, Muneer, executed by the Israeli occupation forces in front of her* (29 January 2024), <https://pchr.org/en/aysha-mousa-al-najjar-had-her-son-muneer-executed-by-the-israeli-occupation-forces-in-front-of-her/>; 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*, A/HRC/56/CRP.4 (10 June 2024), <https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session56/a-hrc-56-crp-4.pdf>, p. 47, paras. 203 - 204; See examples of killing and hiding of bodies at the beach at: “Unarmed Palestinians killed in Gaza”, *Al Jazeera English* (28 March 2024), <https://www.youtube.com/watch?v=DvghyDRzK0>; See examples of killing of more persons and hiding of bodies at the beach at: “Exclusive video shows Israel soldiers killing Palestinians | Al Jazeera Newsfeed”, *Al Jazeera English* (12 June 2024), <https://www.youtube.com/watch?v=MfVFKfNeiPE&rc=1>.

only fighters”.⁴²⁷ Israel has further violated the prohibition against indiscriminate attacks by its extensive use of munitions with wide area effects in densely populated areas, refugee camps, near schools and hospitals — using e.g. 2000 pound bombs,⁴²⁸ which have a predicted lethal fragmentation radius of 360m, and are “expected to cause severe injury and damage as far as 800 metres from the point of impact”⁴²⁹ — as well as unguided, i.e. “dumb” bombs.⁴³⁰ Finally, Israel has systematically and indiscriminately imposed a starvation campaign on the population of Gaza.

96. The attacking of civilians (and civilian infrastructure) reveals Israel’s true purpose: to eliminate and destroy the group formed by *all* Palestinians of Gaza, irrespective of any involvement in hostilities or any association with the military wing of Hamas. It is significant in that regard that the law of genocide draws no distinction between civilians and combatants. Acts of genocide can be directed equally against either category, as they are in this case.⁴³¹ Israel seeks to draw no distinction between the two categories of individuals, assuming and asserting that all members of the group should be eliminated.

I: The pattern of Israel supporting, tolerating and encouraging the commission of crimes against Palestinians

97. The Israeli Government — through its decision-making, and through the actions and statements of its individual members — has encouraged and tolerated the commission of crimes against the Palestinian people. Israel’s Government has overall control over the use of military force.
98. These statements include those by high-ranking officials directly inciting the Israeli military to commit genocide, with officials making these statements in public fora including at the Knesset, in meetings, directly to soldiers, in media appearances and on their official social media platforms. The statements are often evidenced by recordings or by their presence on official accounts, and admitted by the relevant official. These include Ministers claiming that “[t]here are no innocents in the Gaza Strip”,⁴³² that “there is no such thing as uninvolved [civilians] in Gaza”;⁴³³ that

⁴²⁷ Lt. Col. Oz Meshulam at: Dubi Eichnold, “‘We are the owners of the house here’: inside the axis that crosses the Gaza Strip”, *Ynet* (23 February 2024), <https://www.ynet.co.il/news/article/yokra13806889>.

⁴²⁸ Tamara Qiblawi *et al.*, “‘Not seen since Vietnam’: Israel dropped hundreds of 2,000-pound bombs on Gaza, analysis shows”, *CNN* (22 December 2023), <https://edition.cnn.com/gaza-israel-big-bombs/index.html>; See also Robin Stein *et al.*, “A Times Investigation Tracked Israel’s Use of One of Its Most Destructive Bombs in South Gaza”, *The New York Times* (21 December 2023), <https://www.nytimes.com/2023/12/21/world/middleeast/israel-gaza-bomb-investigation.html>. See also e.g. UN HRC, *Detailed findings on the military operations and attacks carried out in the Occupied Palestinian Territory from 7 October to 31 December 2023*, A/HRC/56/CRP.4 (10 June 2024), <https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session56/a-hrc-56-crp-4.pdf>, paras. 198, 442.

⁴²⁹ Action on Armed Violence (‘AOAV’), *Explosive weapons with large destructive radius: air-dropped bombs (the Mark 80 series and Paveway attachments)* (1 March 2016), <https://aoav.org.uk/2016/large-destructive-radius-air-dropped-bombs-the-mark-80-series-and-paveway-attachments/>.

⁴³⁰ Natasha Bertrand and Katie Bo Lillis, “Exclusive: Nearly half of the Israeli munitions dropped on Gaza are imprecise ‘dumb bombs,’ US intelligence assessment finds”, *CNN* (14 December 2023), <https://edition.cnn.com/2023/12/13/politics/intelligence-assessment-dumb-bombs-israel-gaza/index.html>.

⁴³¹ See, generally, *Prosecutor v. Radislav Krstić*, Appeals Chamber, Judgment of 19 April 2004, IT-98-33-A (‘*Krstić* Appeal Judgment’), p. 73, para. 226; See also *Prosecutor v. Popović et al.*, Trial Chamber Judgment (10 June 2010), IT-05-88-T, (‘*Popović et al.* Trial Judgment’), p. 337, para 833.

⁴³² Elhanan Mazuz, “At the height of the fighting: the IDF tightened the instructions for the use of fire in the Gaza Strip”, *Now 14* (30 December 2023), <https://www.now14.co.il/בשיא-הלחימה-בצהל-החמירו-את-הוראות-הפע/>.

⁴³³ Gili Cohen, Itay Blumental, Dov Gil-Har, and Sulieman Masvidan, “Minister Amichai Eliyahu: Atomic bomb on Gaza? This is one of the possibilities”, *Kan* (5 November 2023), <https://www.kan.org.il/content/kan-news/politic/596470/>; Translation in “Far-right minister: Nuking Gaza is an option, population should ‘go to Ireland or deserts’”, *The Times of Israel* (5 November 2023), https://www.timesofisrael.com/liveblog_entry/far-right-minister-nuking-gaza-is-an-option-population-should-go-to-ireland-or-deserts/.

“[t]here are two million Nazis in Gaza”,⁴³⁴ and that Gaza is “a state of human animals,”⁴³⁵ and calling for “total annihilation”,⁴³⁶ that “Gaza’s infrastructure must be utterly destroyed”,⁴³⁷ that “we must stop transferring this [humanitarian] aid”,⁴³⁸ and that “[t]he supporters and helpers of the Nazis should also die. This is true both for “journalists” and for all those “innocent uninvolved.”⁴³⁹

99. Together with the lack of sanction for the destruction of Palestinian life, such statements highlight a pattern of instruction to destroy the entirety of Gaza. They constitute direct encouragement of soldiers to act in this manner, confirming a calculated instruction to destroy the conditions of life necessary for the Palestinian population, and thus to deliberately inflict conditions calculated to bring about the group’s destruction as such. The pattern of these statements, without correction, prosecution,⁴⁴⁰ or even denunciation in the relevant domestic sphere,⁴⁴¹ highlights that these statements, and actions taken in pursuance of them, are supported and encouraged. At the same time, Palestinians are routinely prosecuted and their speech limited.⁴⁴² The message of impunity and intent is clearly reinforced. And soldiers who follow these instructions are not punished but instead rewarded.
100. The deliberate killing and harassment of journalists, and removal and shutting down of media reporting in Gaza, further confirms the policy of preventing media scrutiny of Israeli actions.⁴⁴³ Such deliberate attempts to hide or obfuscate information about Israel’s conduct further demonstrate a systematic refusal to participate in investigations of crimes, including genocide, occurring in Gaza.⁴⁴⁴ Journalists in the West Bank are also detained and subjected to ill-treatment and interrogations on the basis of “incitement.”⁴⁴⁵

⁴³⁴ Israeli Army Radio GLZ, @GLZRadio, Tweet (8:49 am, 15 April 2024), <https://twitter.com/GLZRadio/status/1779764062433284213>; Translated at B.M., @ireallyhateyou, Tweet (12:37 pm, 21 April 2024), <https://twitter.com/ireallyhateyou/status/1781995666593456397>.

⁴³⁵ Yitzhak Issachar Goldknopf, @DOVRUTGoldknopf, Tweet (4:30 pm, 23 May 2024), <https://x.com/DOVRUTGoldknopf/status/1793650649919611107>.

⁴³⁶ “Statement by Minister Bezalel Smotrich on the eve of the Mimouna in Ofakim / Sponsored by B.M. Tech Ltd.”, *Beersheva Times* (30 April 2024), <https://www.youtube.com/watch?v=poyayz7b6jI>; Noa Shpigel, “Israel’s Far-right Minister Smotrich Calls for ‘No Half Measures’ in the ‘Total Annihilation’ of Gaza”, *Haaretz* (30 April 2024), <https://www.haaretz.com/israel-news/2024-04-30/ty-article/.premium/smotrich-calls-for-no-half-measures-in-the-total-annihilation-of-gaza/0000018f-2f4c-d9c3-abcf-7f7d25460000>.

⁴³⁷ Moriya Asraf Wolberg, “Ministers In Cabinet Meeting: ‘This Is An Intelligence [Directorate] Failure; What Happened Here?’”, *13 TV* (7 October 2023), <https://13tv.co.il/item/news/politics/k6d6k-903737400/>.

⁴³⁸ Itamar Ben-Gvir, @itamarbengvir, Tweet (3:37 pm, 29 February 2024), <https://twitter.com/itamarbengvir/status/1763196768458604583>.

⁴³⁹ May Golan, @GolanMay, Tweet (11:30 am, 9 November 2023), <https://x.com/GolanMay/status/1722547293813981248>.

⁴⁴⁰ Shira Naot, “The state attorney recommends not opening an investigation against Eyal Golan and Kobi Peretz”, *Haaretz* (19 August 2024), <https://www.haaretz.co.il/gallery/music/2024-08-19/ty-article/.premium/00000191-6b20-d281-a7fd-fb3f3eb50000>.

⁴⁴¹ See e.g., clarifications only to “foreign media” at: “Prime Minister Netanyahu to the foreign media before the debate in The Hague: “Israel has no intention of permanently occupying Gaza””, *0404* (10 January 2024), <https://www.0404.co.il/?p=950137>. See also a clarification article published only in a foreign press outlet: Isaac Herzog, “The Case Against Israel Rests on Lies: Among them is a quote of mine that South Africa grossly distorted in its presentation to the ICJ”, *Wall Street Journal* (11 February 2024), <https://www.wsj.com/articles/the-case-against-israel-rests-on-lies-the-hague-south-africa-genocide-gaza-bc7c264c>.

⁴⁴² UN HRC, *Human rights situation in the Occupied Palestinian Territory, including East Jerusalem, and the obligation to ensure accountability and justice: Report of the United Nations High Commissioner for Human Rights* (4 March 2024), A/HRC/55/28, <https://undocs.org/A/HRC/55/28>, pp. 11 - 12, paras. 67 - 71.

⁴⁴³ Prime Minister of Israel, @IsraeliPM, Tweet (2:57 pm; 5 May 2024), <https://x.com/IsraeliPM/status/1787104266580091340?lang=en>; Al Jazeera English, @AJEnglish, Tweet (3:50 pm, 5 May 2024) <https://x.com/AJEnglish/status/1787117586431299981?ref>; Shlomo Karhi, @shlomo_karhi, Tweet (1:11 pm, 9 May 2024) <https://x.com/shlomokarhi/status/1788527140616458619>.

⁴⁴⁴ UN OHCHR, *Gaza: UN experts condemn killing and silencing of journalists* (1 February 2024), <https://www.ohchr.org/en/press-releases/2024/02/gaza-un-experts-condemn-killing-and-silencing-journalists>.

⁴⁴⁵ Addameer, *Administrative detention and incitement* (8 July 2024), <https://www.addameer.org/sites/default/files/publications/Arbitrary%20Administrative%20Detention%20A%20Crime%20with%20Unlimited%20Scope%20%281%29.pdf>, pp. 10–11.

J: The pattern of impunity for the perpetrators of crimes committed in pursuance of Israel's other identified patterns of atrocity

101. There is a decades long system of impunity conceived and enforced by Israeli political and military leaders that is evidenced in multiple public reports and accounts by the United Nations and other organisations.
102. ***Pattern of State-policy failures to investigate and punish international crimes committed by Israeli citizens and agents:*** the Israeli military's investigations historically show patterns of investigative anomalies, designed to delay and deflect from criminal responsibility. The failure by Israel to effectively and impartially investigate and prosecute soldiers who have perpetrated international crimes in Gaza is most clearly evidenced in the statistics, especially those on the investigations of the Military Advocate General in respect of 'Operation Cast Lead' (2008-2009), 'Operation Protective Edge' 2014, the Great March of Return (2018), Israel's attack on Gaza in 2021, and in the present conflict. These military offensives and attacks on the Gaza Strip led to the opening of three United Nations Commissions of Inquiry, and a permanent Commission of Inquiry established to investigate all violations and abuses of international human rights law and "all underlying root causes of recurrent tensions, instability and protraction of conflict, including systematic discrimination and repression based on national, ethnic, racial or religious identity."⁴⁴⁶
103. Of the 52 criminal investigations which Israel claimed to have been opened by Israel's Military Advocate General (MAG) following Operation Cast Lead — in which 1,166 Palestinians were killed over the course of 22 days — only three were submitted for prosecution, with soldiers receiving demotions and suspended sentences for using Palestinian children as human shields to search booby trapped bags, and a seven-month sentence for stealing a credit card.⁴⁴⁷
104. Of the 360 incidents allegedly reviewed by the Israeli military following Operation Protective Edge — in which 2,251 Palestinians were killed and 11,231 Palestinians were injured over 50 days — 309 incidents were closed without any type of criminal measures taken against those involved, 24 were opened for criminal investigation and one case resulted in convictions — for looting.⁴⁴⁸
105. Of the 250 incidents opened by the Israeli military following the Great March of Return — during which Israeli snipers along the perimeter of the Gaza Strip killed 206 and injured 33,678 Palestinians — 197 were closed without a criminal investigation, 11 criminal investigations were closed without any of the involved standing trial, and only one investigation led to an indictment, for the killing of a 15-year-old Palestinian boy. The soldier served 30 days of community service and received a suspended sentence and a demotion.⁴⁴⁹

⁴⁴⁶ UN HRC, Res. S-30/1, *Ensuring respect for international human rights and international humanitarian law in the Occupied Palestinian Territory, including East Jerusalem, and in Israel*, A/HRC/RES/S-30/1 (27 May 2021), <https://documents.un.org/doc/undoc/gen/g21/114/96/pdf/g2111496.pdf>, p. 2, para. 1.

⁴⁴⁷ UN HRC, *Report of the Committee of independent experts in international humanitarian and human rights law established pursuant to Council resolution 13/9*, A/HRC/16/24 (18 March 2011), <https://reliefweb.int/report/occupied-palestinian-territory/report-committee-independent-experts-international>, pp. 6, 9 and 10, paras. 24, 30 and 32.

⁴⁴⁸ Yesh Din – Volunteers for Human Rights, *The General Staff Whitewashing Mechanism: The Israeli law enforcement system and breaches of international law and war crimes in Gaza* (May 2024), <https://s3.eu-west-1.amazonaws.com/files.yesh-din.org/FFAmechanism/YeshDin+Mechanism.pdf>, pp. 24-25; UN HRC, *Report of the detailed findings of the independent commission of inquiry established pursuant to Human Rights Council resolution S-21/1*, A/HRC/29/CRP.4 (24 June 2015), <https://www.ohchr.org/en/hr-bodies/hrc/co-i-gaza-conflict/report-co-i-gaza#report>, p. 165, para. 616.

⁴⁴⁹ Yesh Din – Volunteers for Human Rights, *The General Staff Whitewashing Mechanism: The Israeli law enforcement system and breaches of international law and war crimes in Gaza* (May 2024), <https://s3.eu-west-1.amazonaws.com/files.yesh-din.org/FFAmechanism/YeshDin+Mechanism.pdf>, pp. 27-29.

106. Of the 84 incidents examined by the Israeli military following Israel's attack on Gaza in 2021⁴⁵⁰ — in which, over the course of 11 days, 256 Palestinians were killed and 2,000 injured⁴⁵¹ — one indictment was served for the killing of a Palestinian farmer.⁴⁵²
107. Of the 74 military investigations opened since 7 October 2023, only five indictments have been filed.⁴⁵³ Of these, only one indictment dealt with the abuse of detainees and the rest with weapons offences.⁴⁵⁴ Crucially, no investigation, let alone action, has been pursued in respect of the scores of genocidal statements made by officials — including senior political and military figures — and public figures. Amnesty International has written to the Speaker of the Knesset, the Military Advocate General and the Attorney General concerning such statements, but has received no reply.⁴⁵⁵
108. Given “that impunity prevails across the board for violations of international humanitarian law and international human rights law” a 2015 United Nations Commission of Inquiry called on Israel to “break with its recent lamentable track record in holding wrongdoers accountable, not only as a means to secure justice for victims but also to ensure the necessary guarantees for non-repetition.”⁴⁵⁶
109. ***Patterns and Policies of Denial of Criminality:*** Israel entrenches this impunity by outrightly denying that its officials and military agents are culpable of international crimes. Israel does not admit to crimes — crimes carried out by its military are a “mistake”,⁴⁵⁷ or “unfortunate[...]”⁴⁵⁸ or “tragic”⁴⁵⁹ — those who accuse Israel of international law violations are smeared as “terrorists”⁴⁶⁰ or “antisemitic.”⁴⁶¹ Israel provides continual updates claiming that Israeli military operations are compliant with international law,⁴⁶² casting aspersions on authoritative sources claiming otherwise, and blaming other actors for its internationally wrongful acts. For example, despite the ICJ's Order of 24 May 2024, that Israel “[i]mmediately halt its military offensive, and any other action in the Rafah Governorate, which may inflict on the Palestinian group in Gaza conditions of life that could bring about its physical destruction in whole or in part”⁴⁶³ — Israel issued a statement stressing its alleged compliance with international humanitarian law⁴⁶⁴ — as it set out to immediately breach the Court order. Israel's Foreign Ministry announced that “Israel has not and will not conduct military actions in the Rafah area which may inflict on the Palestinian

⁴⁵⁰ *Ibid.*, p.16.

⁴⁵¹ UN OCHA, *Protection of Civilians Report | 24-31 May 2021* (4 June 2021), <https://www.ochaopt.org/poc/24-31-may-2021>.

⁴⁵² Yesh Din Volunteers for Human Rights, *The General Staff Whitewashing Mechanism: The Israeli law enforcement system and breaches of international law and war crimes in Gaza* (May 2024), <https://s3.eu-west-1.amazonaws.com/files.yesh-din.org/FFAmehanism/YeshDin+Mechanism.pdf>, pp. 30-32.

⁴⁵³ Noa Spiegel, “The Israel Defense Forces is investigating to protect the soldiers, the investigators received threats”, *Haaretz* (11 August 2024), <https://www.haaretz.co.il/news/politics/2024-08-11/ty-article/.premium/00000191-4113-d9b2-a3ff-633b28440000>.

⁴⁵⁴ *Ibid.*

⁴⁵⁵ Amnesty International, ‘*You Feel Like You Are Subhuman*’: *Israel's Genocide Against Palestinians in Gaza*, <https://www.amnesty.org/en/documents/mde15/8668/2024/en/> (5 December 2024), p. 275.

⁴⁵⁶ UN HRC, *Report of the detailed findings of the independent commission of inquiry established pursuant to Human Rights Council resolution S-21/1, A/HRC/29/CRP.4* (24 June 2015), <https://www.ohchr.org/en/hr-bodies/hrc/co-i-gaza-conflict/report-co-i-gaza#report>, pp. 180 and 181, paras. 664 and 670.

⁴⁵⁷ Israel Defense Forces, @IDF, Tweet (12:32 am, 3 April 2024), <https://x.com/IDF/status/1775290147426152931>.

⁴⁵⁸ “‘This happens in wartime’: Netanyahu responds to Israeli strike killing aid workers in Gaza”, *Guardian News* (2 April 2024), <https://www.youtube.com/watch?v=z-p-VwD-JGM>.

⁴⁵⁹ Israel Defense Forces, @IDF, Tweet (11:03 am, 2 April 2024), <https://x.com/IDF/status/1775086598314475817?s=20>.

⁴⁶⁰ Neri Zilber, “Israel calls UN a ‘terror organisation’ as tensions escalate over Gaza war”, *Financial Times* (15 May 2024), <https://www.ft.com/content/f0945f3c-e4ab-4c04-8e1e-1e6f8397cb2c>.

⁴⁶¹ Prime Minister's Office, *Statement by PM Netanyahu* (24 April 2024), <https://www.gov.il/en/pages/event-campuses240424>.

⁴⁶² Ministry of Foreign Affairs, *Hamas-Israel Conflict 2023: Frequently Asked Questions* (8 December 2023), <https://www.gov.il/en/pages/swords-of-iron-faq-6-dec-2023#9>.

⁴⁶³ *South Africa v. Israel, Provisional Measures, Order of 24 May 2024*, p. 15, para. 57(2)(a).

⁴⁶⁴ Israel Foreign Ministry, @IsraelMFA, Tweet (6:53 pm, 24 May 2024), <https://x.com/IsraelMFA/status/1794049154953392366>.

civilian population in Gaza conditions of life that could bring about its physical destruction in whole or in part. Israel will continue its efforts to enable humanitarian assistance and will act, in full compliance with the law, to reduce as much as possible harm caused to the civilian population in Gaza.”⁴⁶⁵ By 30 June 2024, at least 88 Palestinians had been killed in Rafah, including two pregnant women, two Palestine Red Crescent Society paramedics, nine Palestinians waiting for humanitarian aid trucks, and 37 killed in their tents in Al Mawasi, the humanitarian zone.⁴⁶⁶ Under-Secretary-General for Humanitarian Affairs and Emergency Relief Coordinator urged States to “[e]nd this nightmare.”⁴⁶⁷ No credible investigation of these killings occurred. Even as the ICJ ordered Israel to carry out a widespread humanitarian response “at scale” in response to famine “setting in”,⁴⁶⁸ Israel denied the famine in Gaza — “this myth that there is hunger in Gaza is exactly that, a myth.”⁴⁶⁹

110. ***Resistance to, and obstruction of, every ‘international’ effort to investigate Israel’s actions:*** Israel has systematically obstructed the investigative and human rights work of United Nations Special Rapporteurs on the Occupied Palestinian Territory,⁴⁷⁰ United Nations Commissions of Inquiry,⁴⁷¹ and the staff of the Office of the High Commissioner for Human Rights, preventing their entry into Palestine.⁴⁷² The recommendations of some eleven successive United Nations Commissions of Inquiry and Fact Finding Missions, collectively call for an end to the “long-standing impunity” which “has been a key factor in the perpetuation of violence in the region and in the reoccurrence of violations”⁴⁷³ — recommendations which successive governments in Israel have wilfully ignored, making it clear that the resulting deaths

⁴⁶⁵ *Ibid.*

⁴⁶⁶ On 25 May 2024, 6 Palestinians were killed in central Rafah, in this regard see: UN OCHA, *Hostilities in the Gaza Strip and Israel | Flash Update #171* (27 May 2024), <https://www.ochaopt.org/content/hostilities-gaza-strip-and-israel-flash-update-171>; On 26 May 2024, 5 Palestinians, including one pregnant woman, were killed in Western Rafah, in this regard see: UN OCHA, *Hostilities in the Gaza Strip and Israel | Flash Update #172* (29 May 2024), <https://www.ochaopt.org/content/hostilities-gaza-strip-and-israel-flash-update-172>; 2 Palestinian Red Crescent Paramedics were killed while on duty in Rafah, in this regard see: UN OCHA, *Humanitarian Situation Update #173 | Gaza Strip* (31 May 2024), <https://www.ochaopt.org/content/humanitarian-situation-update-173-gaza-strip>; On 17 June 2024, 9 Palestinians were killed when a group of people were waiting for aid trucks, in this regard see: UN OCHA, *Humanitarian Situation Update #180 | Gaza Strip & West Bank* (19 June 2024), <https://www.unocha.org/publications/report/occupied-palestinian-territory/humanitarian-situation-update-180-gaza-strip-west-bank-enarhe>; On 19 June 2024, 20 Palestinians were killed in separate incidents in Rafah, in this regard see: UN OCHA, *Humanitarian Situation Update #181 | Gaza Strip* (21 June 2024), <https://www.unocha.org/publications/report/occupied-palestinian-territory/humanitarian-situation-update-181-gaza-strip-west-bank>; On 22 June 2024, 24 people were killed when tents of displaced people were hit in Al Mawasi, in this regard see: UN OCHA, *Humanitarian Situation Update #182 | Gaza Strip* (24 June 2024), <https://www.unocha.org/publications/report/occupied-palestinian-territory/humanitarian-situation-update-182-gaza-strip-enarhe>; 19 Palestinians were killed, including 13 who were killed when tents for internally displaced persons were hit in Al Mawasi, in this regard see: UN OCHA, *Humanitarian Situation Update #185 | Gaza Strip* (1 July 2024), <https://www.unocha.org/publications/report/occupied-palestinian-territory/humanitarian-situation-update-185-gaza-strip>.

⁴⁶⁷ UN OCHA, *Statement on Rafah by Martin Griffiths, Under-Secretary-General for Humanitarian Affairs and Emergency Relief Coordinator* (24 May 2024), <https://reliefweb.int/report/occupied-palestinian-territory/statement-rafah-martin-griffiths-under-secretary-general-humanitarian-affairs-and-emergency-relief-coordinator-24-may-2024>; See also UN OCHA, *Hostilities in the Gaza Strip and Israel | Flash Update #171* (27 May 2024), <https://www.unocha.org/publications/report/occupied-palestinian-territory/hostilities-gaza-strip-and-israel-flash-update-171-enarhe>.

⁴⁶⁸ *South Africa v. Israel, Provisional Measures, Order of 24 May 2024*, pp. 4 and 15, paras. 11 and 57 (2)(b). See also warnings of the risk of famine in *South Africa v. Israel, Provisional Measures, Order of 26 January 2024*, pp. 16-17, paras. 47 and 49.

⁴⁶⁹ “LIVE: The Daily Briefing - 21/03/2024”, *Prime Minister’s Office* (21 March 2024), <https://www.youtube.com/live/y-7G2MzKQxk> [8:47].

⁴⁷⁰ UNGA, *Report of the Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967*, UN Doc A/HRC/25/67 (13 January 2014), <https://documents.un.org/doc/undoc/gen/g14/101/98/pdf/g1410198.pdf>, p. 3, para. 2.

⁴⁷¹ UN OHCHR, *Commission of Inquiry on the Occupied Palestinian Territory Concludes that Israeli Authorities and Hamas Are Both Responsible for War Crimes* (19 June 2024), <https://www.ohchr.org/en/news/2024/06/commission-inquiry-occupied-palestinian-territory-concludes-israeli-authorities-and-hamas>.

⁴⁷² UN OHCHR, *Bachelet deplores Israel’s failure to grant visas for UN Human Rights staff in the Occupied Palestinian Territory* (30 August 2022), <https://www.ohchr.org/en/press-releases/2022/08/bachelet-deplores-israels-failure-grant-visas-un-human-rights-staff-occupied>.

⁴⁷³ See e.g. UN HRC, *Human Rights in Palestine and other Occupied Arab Territories: Report of the United Nations Fact-Finding Mission on the Gaza Conflict*, A/HRC/12/48 (25 September 2009), <https://undocs.org/A/HRC/12/48>, para. 1964.

and hardship were intended results of Israel's policy. Most recently, Israel has also systematically denied access to United Nations Special Rapporteurs and the United Nations Commission of Inquiry into Gaza, despite repeated calls by the United Nations for fact-finders to be granted access urgently in light of the "prevailing climate of impunity" in Israel.⁴⁷⁴ The Commission of Inquiry "requested Israel to ensure the Commission's immediate access to the Gaza Strip to investigate and preserve evidence, in compliance with the order of the International Court of Justice on 24 May 2024. Israel had ignored the request."⁴⁷⁵ Israel's intransigence evidences its efforts to prevent any form of credible investigation of its acts on the ground where victims are located and evidence of its deeds to be collected.

111. High ranking Israeli officials have repeatedly impugned the International Court of Justice and expressed contempt for it and its proceedings. Israel has also ignored previous rulings of the ICJ, and Israeli Government ministers and parliamentarians have repeatedly rejected the Court and its findings in respect of the present conflict. For example, the Prime Minister's formal response to the Court's order was to label it "a mark of disgrace that will not be erased for generations",⁴⁷⁶ and that there was "no greater absurdity" as the "very willingness in The Hague to discuss this ridiculous claim, the very fact that it was not rejected outright, proves that many in the world have not learned anything from the Holocaust."⁴⁷⁷ Other Israel officials have derided the Provisional Measures Orders as an "irrelevant order of the anti-semitic court in the Hague",⁴⁷⁸ warning that "[d]ecisions that endanger the continued existence of the State of Israel should not be obeyed,"⁴⁷⁹ stressing further that "the Hague Tribunal" is a "circus of hypocrisy, evil, and hatred of Jews."⁴⁸⁰
112. Israel has also actively sought to shut down any investigation and prosecution of Israeli crimes internationally. Israel has targeted the Palestinian Authority, Palestinian human rights NGOs, and the Prosecutor of the International Criminal Court, while Israeli State organs continue to try and shield perpetrators of international crimes from investigation and prosecution. Immediately after the State of Palestine's accession to the Rome Statute in 2015, Israel withheld tax revenues due to the Palestinian Authority in an act of collective punishment, and again in October 2023 for "acting against Israel at the International Criminal Court and the International Court of Justice."⁴⁸¹ Israel has similarly interfered with investigations by the International Criminal Court: as revealed by an investigative report,⁴⁸² Israel attempted to pressure the former Prosecutor to stop her inquiry into Israel, including through levying threats against her and her family.

⁴⁷⁴ Irene Nasser and Duarte Mendonca, "UN demands investigation after mass graves found at Gaza hospitals raided by Israel", *CNN* (24 April 2024), <https://edition.cnn.com/2024/04/24/middleeast/un-calls-for-investigation-gaza-mass-graves-mime-intl/index.html>.

⁴⁷⁵ UN OHCHR, *Commission of Inquiry on the Occupied Palestinian Territory Concludes that Israeli Authorities and Hamas Are Both Responsible for War Crimes* (19 June 2024), <https://www.ohchr.org/en/news/2024/06/commission-inquiry-occupied-palestinian-territory-concludes-israeli-authorities-and-hamas>.

⁴⁷⁶ Israel Prime Minister's Office (Hebrew), *Prime Minister Netanyahu in reference to the decision of the International Court of Justice in The Hague* (26 January 2024), <https://www.gov.il/he/departments/news/spoke-hague260124>.

⁴⁷⁷ Israeli Ministry of Foreign Affairs, *Statement by PM Netanyahu* (27 January 2024), <https://www.gov.il/en/departments/news/statement-by-pm-netanyahu-27-jan-2024>.

⁴⁷⁸ Anna Barsky, "Severe criticism in Israel of the Court in the Hague: 'They have become collaborators with terrorists'", *Maariv* (24 May 2024), <https://www.maariv.co.il/news/politics/Article-1101635>.

⁴⁷⁹ Paz Abuhatzera, "Ben-Gvir on the court's decision: 'Hague Shmague, they are continuing with the hypocrisy and persecution of the Jewish people'", *0404* (26 January 2024), <https://www.0404.co.il/?p=954729>.

⁴⁸⁰ Tzvi Sukkot, @tzvisuccot, Tweet (2:44 pm, 26 January 2024), <https://x.com/tzvisuccot/status/1750862179069198556>.

⁴⁸¹ Colin Powers, "Palestine on the Brink of Crisis", *Middle East Research and Information Project* (30 June 2020), <https://merip.org/2020/06/palestine-on-the-brink-of-crisis/>; "Israel freezes tax revenues for Palestinian Authority", *Middle East Monitor* (30 October 2023), <https://www.middleeastmonitor.com/20231030-israel-freezes-tax-revenues-for-palestinian-authority/>; See also "Israel freezes Palestinian tax funds over international criminal court move", *The Guardian* (3 January 2015), <https://www.theguardian.com/world/2015/jan/03/israel-tax-payments-withhold-palestine-international-criminal-court>.

⁴⁸² Harry Davies, "Revealed: Israeli spy chief 'threatened' ICC prosecutor over war crimes inquiry", *The Guardian* (28 May 2024), <https://www.theguardian.com/world/article/2024/may/28/israeli-spy-chief-icc-prosecutor-war-crimes-inquiry>.

Following the ICC Prosecutor's request for arrest warrants against Israel's Prime Minister and Minister of Defence, Israel's Ministry of Foreign Affairs established a special task force to "deal with the crisis of international arrest warrants, and the mobilisation of legal support from the countries of the world", and the Israeli Minister of Foreign Affairs requested States to submit opinions against the Prosecutor's request, so that "the judges may be convinced that there is no reason to respond to the Prosecutor's request."⁴⁸³ Prime Minister Netanyahu rejected "[t]he absurd and false order of the prosecutor in The Hague" which he considered "is directed against the entire State of Israel."⁴⁸⁴ He rejected "[t]he outrageous decision" of the prosecutor in the ICC calling it a "moral outrage of historic proportions", "a travesty of justice", "absurd charges" and "merely an attempt to deny Israel the basic right of self-defence".⁴⁸⁵ He declared that Prosecutor Khan was "callously pouring gasoline on the fires of antisemitism" and would take his place "amongst the great anti-Semites of modern times . . . he now stands alongside those infamous German judges who donned their robes and upheld laws that denied the Jewish people their most basic rights and enabled the Nazis to perpetrate the worst crime in history."⁴⁸⁶

IV. REPORTED STATEMENTS OF INTENT AND INCITEMENT TO GENOCIDE

113. Consistent with earlier expressions of genocidal intent, officials of the Israeli Government and military have continued openly to speak and post media evidencing genocidal intent and incitement, dehumanisation of Palestinians and contempt for international organisations, including the United Nations and its agencies.
114. The genocidal rhetoric began immediately after 7 October 2023. The genocide historian, Omer Bartov, commented on the early statements of Israeli leaders in October and November 2023. He took the view at that time that "although the statements of Israeli leaders suggested genocidal intent, there was still time to stop Israel from perpetrating genocide."⁴⁸⁷ The words had not been matched by deeds in his view; that while the intention had been formed, it had not yet been acted upon. Since then, the dehumanising and annihilatory rhetoric has intensified and pervaded all layers of Israeli Government and military. One striking example, from the highest office, is Prime Minister Netanyahu's repeated invocation of the biblical story of the destruction of the people of 'Amalek'. As Amnesty International notes:

"[R]egardless of the Israeli authorities' insistence that the reference to the people of Amalek is merely an injunction upon Jews never to forget the evil acts of their enemies, it is a well-known biblical story of absolute vengeance in which an entire nation – the people of Amalek – is ordered to be destroyed. The fact that Prime Minister Netanyahu made these references in the first week of Israel's ground invasion in Gaza, directly addressing soldiers and the wider Israeli public to garner their support for the new and highly destructive phase of the conflict, that the speech refers to revenge for the Hamas-led attacks, and that the letter aimed to motivate soldiers to fight undermines the credibility of Israel's defence. This is particularly so considering that, as the highest office-holder, Prime Minister Netanyahu oversaw the offensive on Gaza. He would have most certainly known how his words would be understood by soldiers, particularly those affiliated with the settler movement and religious nationalist

⁴⁸³ "Israel asks 25 countries to intervene against ICC arrest warrants for Netanyahu, Gallant", *Middle East Monitor* (2 July 2024), <https://www.middleeastmonitor.com/20240702-israel-asks-25-countries-to-intervene-against-icc-arrest-warrants-for-netanyahu-gallant/>.

⁴⁸⁴ Daniel Edelson, "'Outrageous' and 'shameful': US officials react to ICC prosecutor's request for arrest warrants", *Ynet* (20 May 2024), <https://www.ynetnews.com/article/syrmwztqr>.

⁴⁸⁵ *Ibid.*

⁴⁸⁶ *Ibid.*

⁴⁸⁷ Omer Bartov, "As a former IDF soldier and historian of genocide, I was deeply disturbed by my recent visit to Israel", *The Guardian* (13 August 2024), <https://www.theguardian.com/world/article/2024/aug/13/israel-gaza-historian-omer-bartov>.

parties, given their leaders' previous calls for the destruction of Gaza. Indeed, Amnesty International has identified five videos posted on social media in which Israeli soldiers interpreted the reference to the people of Amalek as a call for the annihilation of Palestinians in Gaza."⁴⁸⁸

115. And as the Patterns of genocidal acts in Section V show, time and again genocidal words and deeds have moved in lock-step. Bartov has since acknowledged that the genocidal speech has been followed by genocidal acts: "In other words, the rhetoric spouted by Israeli leaders since October 2023 was now being translated into reality – namely, as the 1948 United Nations Genocide Convention puts it, that Israel was acting "with intent to destroy, in whole or in part", the Palestinian population in Gaza, "as such, by killing, causing serious harm, or inflicting conditions of life meant to bring about the group's destruction"."⁴⁸⁹
116. It is a view that is shared by an increasing number of States and international organisations as reflected in Section II above.
117. The examples of genocidal and incitement rhetoric are extensive and growing. South Africa sets out a collation of the rhetoric in four Annexes that accompany this Dossier:
 - Genocidal intent and incitement to genocide statements by senior Israeli Government officials
 - Genocidal intent and incitement to genocide statements by Israeli military officials and soldiers
 - Incitement to genocide by public figures in Israel
 - Public statements evidencing contempt for the International Court of Justice and the United Nations by Israeli Government officials

V. EVENTS IN 2025 BEFORE AND AFTER THE CEASEFIRE

118. On 15 January 2025 an agreement was reached for a ceasefire between Israel and Hamas, which went into effect on 19 January 2025.⁴⁹⁰ As of 2 February 2025, four releases of captives have taken place, with the release so far of a total of 583 Palestinian detainees and 18 Israeli hostages. In the release of 25 January 2025, four Israeli hostages were released and 200 Palestinian captives, of which 70 were released, not to Gaza or the West Bank, but unlawfully exiled and deported to Egypt.⁴⁹¹ Throughout all stages Palestinian detainees reported they had been subjected in Israeli detention facilities to torture, and cruel, inhumane and degrading treatment, of which some took place just prior to release.⁴⁹²

⁴⁸⁸ Amnesty International, 'You Feel Like You Are Subhuman': Israel's Genocide Against Palestinians in Gaza (5 December 2024), <https://www.amnesty.org/en/documents/mde15/8668/2024/en/>, p. 260 (emphasis added).

⁴⁸⁹ Omer Bartov, "As a former IDF soldier and historian of genocide, I was deeply disturbed by my recent visit to Israel", *The Guardian* (13 August 2024), <https://www.theguardian.com/world/article/2024/aug/13/israel-gaza-historian-omer-bartov>.

⁴⁹⁰ "Israel, Hamas reach ceasefire deal designed to end 15-month Gaza war", *Reuters* (15 January 2025), <https://www.reuters.com/world/middle-east/israel-hamas-reach-ceasefire-agreement-designed-end-15-month-gaza-war-official-2025-01-15/>; UN OCHA, *Humanitarian Situation Update #257 | Gaza Strip* (22 January 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-257-gaza-strip>.

⁴⁹¹ *Ibid*; ICRC, *Israel and the Occupied Territories: ICRC completes second phase of release operations, reuniting more families* (25 January 2025), <https://www.icrc.org/en/news-release/israel-and-occupied-territories-icrc-completes-second-phase-release-operations>; "70 freed and exiled Palestinians reach Egypt", *The New Arab* (25 January 2025), <https://www.newarab.com/news/70-freed-and-exiled-palestinians-reach-egypt>.

⁴⁹² "Palestinians released by Israel show signs of 'torture, starvation'", *Al Jazeera* (1 February 2025), <https://www.aljazeera.com/news/2025/2/1/palestinians-released-by-israel-show-signs-of-torture-starvation>; "Gaza Ceasefire: Palestinian Lawyer Says Women, Children Released by Israel Faced Torture, Starvation", *Democracy Now* (20 January 2025), https://www.democracynow.org/2025/1/20/palestinian_prisoners.

119. Between the ceasefire announcement and the start of the ceasefire Israel killed at least 122 Palestinians, including 33 women and 33 children, and injured at least 270 Palestinians in Gaza.⁴⁹³ Between 20 and 22 January 2025 — after the ceasefire came into effect — the Ministry of Health reported a total of 65 additional Palestinians killed and 416 injured, mostly in attacks that occurred prior to the ceasefire, and reported the retrieval of 183 bodies.⁴⁹⁴ In the three days after the ceasefire was announced, and prior to it taking effect on 19 January 2025, Israel escalated its bombardments, and continued to displace the Palestinian population in Gaza, issuing evacuation orders for Palestinians in Jabalya to move to Gaza City.⁴⁹⁵
120. Between 19 January 2025, the start of the ceasefire, and 4 February 2025, Israel further killed at least 43 civilians, including 7 children, 2 women, and an elderly man, with others wounded.⁴⁹⁶ Israel continued to kill Palestinians in the days after, in cases where Israeli forces opened fire at Palestinians, including in areas in or near the identified buffer zones under the ceasefire agreement, as well as due to the explosion of unexploded ordnance. For example, on 27 January 2025, a girl was reportedly killed and others injured when an animal-driven cart was hit on Al Rashid Road, northwest of An Nuseirat while returning towards the north. On the same day, a man was reportedly killed and others injured when a bulldozer was hit in An-Nuweiri area, northwest of An Nuseirat. Earlier, on 22 January, one Palestinian was reportedly killed and two were injured by an explosive remnant of war in At-Twam area, west of Jabalya, in North Gaza.⁴⁹⁷ Around 26 January 2025, the Israeli military fired at internally displaced Palestinians in Gaza who sought to return home, killing two persons and injuring nine.⁴⁹⁸ Between the start of the ceasefire and 4 February 2025, the Ministry of Health ('MoH') in Gaza also reported that it had retrieved 467 bodies across the Gaza Strip.⁴⁹⁹

Displacement

121. On 26 January 2025, a military order providing for the return of Palestinians to northern Gaza included prohibitions on Palestinians approaching the Rafah crossing area, the Philadelphi corridor area, and all areas where Israeli forces are deployed. The order prohibited Palestinians from approaching the buffer zone, and against swimming,

⁴⁹³ Ibrahim Dahman, "Death toll from Israeli attacks in Gaza since ceasefire deal announced rises to 122", *CNN World* (18 January 2025), <https://www.cnn.com/world/live-news/israel-hamas-ceasefire-war-palestine-01-18-25#cm61xua4f000e3b6mt7kyyt12>; "More than 100 people killed in Gaza since ceasefire agreed", *Al Jazeera* (17 January 2025), <https://www.aljazeera.com/gallery/2025/1/17/more-than-100-people-killed-in-gaza-since-truce-deal>; See also UN OCHA, *Humanitarian Situation Update #257 | Gaza Strip* (22 January 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-257-gaza-strip>.

⁴⁹⁴ UN OCHA, *Humanitarian Situation Update #257 | Gaza Strip* (22 January 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-257-gaza-strip>.

⁴⁹⁵ Avichay Adraee @AvichayAdraee, Tweet (1:53 am, 15 January 2025), <https://x.com/AvichayAdraee/status/1879497240701800714>.

⁴⁹⁶ PCHR, *PCHR Condemns Continued Israeli Occupation Forces' Killing of Civilians in Gaza Despite Ceasefire* (25 January 2025), <https://pchrgaza.org/pchr-condemns-continued-israeli-occupation-forces-killing-of-civilians-in-gaza-despite-ceasefire/>; UN OCHA, *Humanitarian Situation Update #261 | Gaza Strip* (5 February 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-261-gaza-strip>.

⁴⁹⁷ UN OCHA, *Humanitarian Situation Update #259 | Gaza Strip* (28 January 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-259-gaza-strip>; UN OCHA, *Humanitarian Situation Update #257 | Gaza Strip* (22 January 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-257-gaza-strip>; UN OCHA, *Humanitarian Situation Update #261 | Gaza Strip* (5 February 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-261-gaza-strip>.

⁴⁹⁸ Willem Marx, "Israeli troops fire on displaced Palestinians hoping to return to homes, killing 2", *NPR* (26 January 2025), <https://www.npr.org/2025/01/26/nx-s1-5275452/israel-gaza-ceasefire-hostages-lebanon-trump>; "Israel blocks thousands of Palestinians from returning to northern Gaza over ceasefire dispute", *France 24* (26 January 2025), <https://www.france24.com/en/video/20250126-israel-blocks-thousands-of-palestinians-from-returning-to-northern-gaza-over-ceasefire-dispute>.

⁴⁹⁹ UN OCHA, *Humanitarian Situation Update #261 | Gaza Strip* (5 February 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-261-gaza-strip>.

fishing, diving and entering the sea in the coming days.⁵⁰⁰ Since the ceasefire, at least 14 Palestinians, including two boys and one girl were killed around the buffer zone — described by commentators on Israel’s Channel 12 as “an annihilation zone”.⁵⁰¹

122. On 25 January, having extended the closure of the Netzarim Corridor,⁵⁰² Israeli forces opened fire on displaced Palestinians as they gathered on Salah-Al-Din street near the so-called Netzarim Corridor.⁵⁰³ By 26 January 2025, thousands of Palestinian civilians gathered in the area at Netzarim Corridor delayed from returning to northern Gaza,⁵⁰⁴ collectively held as a negotiating chip to secure the release of an Israeli soldier.⁵⁰⁵ As 376,000 Palestinians began their hours long walk to northern Gaza, on 27 January 2025, Israeli Minister Ben Gvir stated on social media, “This is not what ‘total victory’ looks like . . . We must go back to war - and destroy!”⁵⁰⁶
123. Among the thousands of Palestinians returning to North Gaza, many extremely vulnerable pregnant women, children, the elderly aided with crutches,⁵⁰⁷ were “forced to walk long distances with unreliable telecommunication networks and no available toilets” and “without adequate assistance” — with children separated from their families in increasing numbers,⁵⁰⁸ on broken dirt roads destroyed by the Israeli military.⁵⁰⁹ With no shelter or basic conditions for survival, thousands of displaced Palestinians slept on the ground in dire conditions, exposed to the elements.⁵¹⁰ Most of the population is currently displaced and moving between different governorates, in need of basic humanitarian assistance including shelter assistance, hygiene kits, food, water, blankets, mats, kitchen sets and clothing.⁵¹¹ Israel has failed in its obligations as an Occupying Power to “ensure, to the greatest practicable extent, that proper accommodation is provided to receive the protected persons, that the removals are effected in satisfactory conditions of hygiene, health, safety and nutrition, and

⁵⁰⁰ Avichay Adraee @AvichayAdraee, Tweet (12:34 pm, 27 January 2025),

<https://x.com/AvichayAdraee/status/1883644796968841334>; Avichay Adraee @AvichayAdraee, Tweet (6:17 am, 25 January 2025), <https://x.com/AvichayAdraee/status/1883006276839555434>.

⁵⁰¹ UN OHCHR, *Accountability and human rights- basis of just peace in the Occupied Palestinian Territory* (28 January 2025), <https://reliefweb.int/report/occupied-palestinian-territory/accountability-and-human-rights-basis-just-peace-occupied-palestinian-territory-enar>; B.M. @ireallyhateyou, Tweet (3:18 am, 16 January 2025), <https://x.com/ireallyhateyou/status/1879699655451381837>.

⁵⁰² Avichay Adraee, @AvichayAdraee, Tweet (1:30 am, 26 January 2025), <https://x.com/AvichayAdraee/status/1883296450739601726>; Avichay Adraee, @AvichayAdraee, Tweet (1:54 pm, 25 January 2025), <https://x.com/AvichayAdraee/status/1883121203017080903>; @Avichay Adraee, Tweet (1:02 pm, 25 January 2025), <https://x.com/AvichayAdraee/status/1883108102779592928>.

⁵⁰³ Al Jazeera English @AJEnglish, Tweet (7:00 pm, 25 January 2025), <https://x.com/AJEnglish/status/1883198153337553169>; TIMES OF GAZA, @Timesofgaza, Tweet (1:52 pm, 26 January 2025), <https://x.com/Timesofgaza/status/1883483096227663969>.

⁵⁰⁴ Gaza Notifications @gazanotice, Tweet (9:43 am, 26 January 2025), <https://x.com/gazanotice/status/1883420433506074946>; Quds News Network, @QudsNen, Tweet (10:09 am, 26 January 2025), <https://x.com/QudsNen/status/1883427121437213086>.

⁵⁰⁵ Amy Spiro et al, “Islamic Jihad says deal reached to release Arbel Yehoud; PM’s office says talks ongoing”, *The Times of Israel* (26 January 2025), <https://www.timesofisrael.com/israelic-jihad-says-deal-reached-to-release-arbel-yehud-pms-office-says-talks-ongoing/>; Avichay Adraee, @AvichayAdraee, Tweet (12:00 pm, 25 January 2025), <https://x.com/AvichayAdraee/status/1883092561457451384>.

⁵⁰⁶ UNRWA, *UNRWA Situation Report #157 on the Humanitarian Crisis in the Gaza Strip and the West Bank, including East Jerusalem* (31 January 2025), <https://www.unrwa.org/resources/reports/unrwa-situation-report-157-situation-gaza-strip-and-west-bank-including-east-jerusalem>; Itamar Ben-Gvir, @itamarbengvir, Tweet (7:57 am, 27 January 2025), <https://x.com/itamarbengvir/status/1883756309142818941>.

⁵⁰⁷ Quds News Network, @QudsNen, Tweet (1:34 pm, 28 January 2025), <https://x.com/QudsNen/status/1884203405805330524>; Quds News Network, @QudsNen, Tweet (10:27 am, 27 January 2025), <https://x.com/QudsNen/status/1883793834091700355>.

⁵⁰⁸ UN OHCHR, *Accountability and human rights – basis of just peace in the Occupied Palestinian Territory* (28 January 2025), <https://reliefweb.int/report/occupied-palestinian-territory/accountability-and-human-rights-basis-just-peace-occupied-palestinian-territory-enar>.

⁵⁰⁹ “Al Jazeera reporter’s journey back home to north Gaza”, *Al Jazeera* (28 January 2025), <https://www.aljazeera.com/program/newsfeed/2025/1/28/al-jazeera-reporters-journey-back-home-to-north-gaza#flips-6367878665112:0>.

⁵¹⁰ Anas Al-Sharif, @AnasAlSharif, Tweet (7:41 pm, 27 January 2025), <https://x.com/AnasAlSharif0/status/1883933254748885050>.

⁵¹¹ Site Management Working Group Gaza, *Site Management - Update 4* (24 January 2025), <https://www.cccmcluster.org/sites/default/files/2025-01/SMWG%20Gaza%20-%20Update%204%20%2824January%202025%29.pdf>.

that members of the same family are not separated”.⁵¹² Medical sources report that “250 displaced people had been admitted to the hospital for exhaustion during their return to the north and one elderly Palestinian man reportedly died along the journey, which is at least a seven-kilometre walk only to cross the Netzarim corridor itself”.⁵¹³ Palestinians returning to houses in rubble are also facing heightened risks from unexploded ordnances, remnants which have already killed a child and injured others in an explosion on 27 January 2025.⁵¹⁴

Aid

124. As progress is being reported by the United Nations and NGOs in bringing aid into Gaza, with more than 630 trucks with humanitarian aid entering Gaza on 19 January 2025, at least 300 of them to the North;⁵¹⁵ and humanitarian organisations indicating that they have dozens more truckloads of these supplies, ready to enter;⁵¹⁶ there are continuous challenges that affect all operations in Gaza. These include unexploded ordnances, rubble, and widespread destruction which requires concerted international effort.⁵¹⁷
125. Israel also continues to restrict the entry of critical humanitarian supplies into Gaza, these include agricultural inputs critical for the resumption of agricultural activities; the telecommunications equipment; materials and equipment necessary to conduct repairs (spare parts, cement, pipes) especially influencing the ability of humanitarian organisations to “carry out needed [water and sanitation] repairs and emergency services, including to re-connect damaged buildings to sewage networks and establish appropriate latrine space”.⁵¹⁸ Israel also continues to restrict the entry of educational supplies, including learning materials and student kits, further depriving children in Gaza of their right to education.⁵¹⁹
126. Between 1 and 3 February 2025, at least 105 sick and wounded Palestinians left Gaza through the Rafah crossing for medical treatment in Egypt, marking the first medical evacuations since the ceasefire, and the first transits through the Rafah crossing since

⁵¹² Article 49, Fourth Geneva Convention Relative to the Protection of Civilian Persons in Time of War (12 August 1949); See also Gaza Notifications @gazanotice, Tweet (5:32 pm, 25 January 2025), <https://x.com/gazanotice/status/1883176200559878439>.

⁵¹³ UN OCHA, *Humanitarian Situation Update #259 | Gaza Strip* (28 January 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-259-gaza-strip?>.

⁵¹⁴ *Ibid*; See also Gaza Notifications @gazanotice, Tweet (6:11 pm, 27 January 2025), <https://x.com/gazanotice/status/1883940895310967213>; UN News, *Aid efforts in Gaza escalate, as risk from deadly unexploded ordnance grows* (29 January 2025), <https://news.un.org/en/story/2025/01/1159571>.

⁵¹⁵ UN Secretary-General, *Secretary-General's remarks to the Security Council - on the Middle East [as delivered]* (20 January 2025), <https://www.un.org/sg/en/content/sg/statement/2025-01-20/secretary-generals-remarks-the-security-council-the-middle-east-delivered>; The UN OCHA reported that the number of trucks was higher – at 915, see Michelle Nichols, “UN says 915 aid trucks entered Gaza on Monday”, *Reuters* (21 January 2025), <https://www.reuters.com/world/middle-east/un-says-915-aid-trucks-entered-gaza-monday-2025-01-20/>.

⁵¹⁶ Kristine Grønhaug, “Gaza: We have no time to lose”, *Norwegian Refugee Council* (31 January 2025) <https://www.nrc.no/news/2025/january/gaza-we-have-no-time-to-lose>; Catherine Russel, @unicefchief, Tweet (3:36 pm, 19 January 2025), <https://x.com/unicefchief/status/1880987803678372107>; UN News, *Gaza crisis: Amid winter storms, humanitarian appeal for full aid access* (10 February 2025), <https://news.un.org/en/story/2025/02/1159946>. See also ‘challenges’ in UN OCHA, *Gaza Humanitarian Response Update | 19 January - 1 February 2025* (4 February 2025), <https://www.ochaopt.org/content/gaza-humanitarian-response-update-19-january-1-february-2025>.

⁵¹⁷ UNRWA, @UNRWA, Tweet (8:00 am, 25 January 2025), <https://x.com/UNRWA/status/1883032179841601893>; UN Palestine, *Aid efforts in Gaza escalate, as risk from deadly unexploded ordnance grows* (30 January 2025), <https://palestine.un.org/en/288440-aid-efforts-gaza-escalate-risk-deadly-unexploded-ordnance-grows>.

⁵¹⁸ UN OCHA, *Humanitarian Situation Update #261 | Gaza Strip* (5 February 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-261-gaza-strip>.

⁵¹⁹ *Ibid*.

it was taken over by Israeli forces and closed in May 2024.⁵²⁰ The United Nations Secretary-General has warned that 2,500 Palestinian children in Gaza are waiting to be permitted medical evacuation, and are at imminent risk of death in the coming weeks if not granted such permission.⁵²¹ The World Health Organisation estimated that “12,000 to 14,000 people still require medical evacuation outside Gaza”.⁵²²

127. The scaling up of humanitarian aid since the ceasefire also clearly evidences Israel's capacity to increase aid as it will. The looming ban on UNRWA (dealt with in the section below) however threatens the delivery of life-saving aid, the restoration of essential services such as schools and health clinics in the future and threatens the stability of the ceasefire.⁵²³

UNRWA

128. On 30 January 2025, Israel's ban on UNRWA went into effect.⁵²⁴ The spokesman for the United Nations Secretary-General stated on 31 January 2025 that despite the ban, “UNRWA clinics across the occupied West Bank, including East Jerusalem, are open.”⁵²⁵ UNRWA's spokesperson explained that the organisation is now operating in a “nightmare scenario”, but confirmed that as at 31 January 2025 UNRWA had 5,000 staff still working in Gaza as the “backbone of the international aid operation” and their work may be compromised by the situation.⁵²⁶
129. This extremely precarious situation poses a serious further risk to the ceasefire.

West Bank

130. On 20 January 2025, Israeli military Chief of Staff, Lt. Gen. Herzl Halevi urged preparations for “significant operations” in the West Bank “to pre-empt and catch the terrorists before they reach our civilians”.⁵²⁷ On 21 January 2025, Prime Minister Netanyahu launched “an extensive and significant military operation . . . to eradicate terrorism in Jenin”, known as the “Iron Wall”, suggesting that Israel was “methodically and resolutely operating against the Iranian axis wherever it sends its arms — in Gaza, Lebanon, Syria, Yemen and Judea and Samaria — and with more to come”.⁵²⁸ Israel's Minister of Defence, Israel Katz, explained that the assault on Jenin is “the first lesson

⁵²⁰ *Ibid.* Alastair McCready et al., “37 children make it out of Gaza for treatment in Egypt”, *Al Jazeera* (1 February 2025), <https://aje.io/8uw5rh?update=3483803>; Maziar Motamedi & Usaid Siddiqui, “Updates: Israel attacks Jenin buildings, Netanyahu to US for Trump talks”, *Al Jazeera* (2 February 2025), <https://www.aljazeera.com/news/liveblog/2025/2/2/live-israels-netanyahu-heads-to-us-to-meet-trump-before-ceasefire-talks>.

⁵²¹ Michelle Nichols, “UN chief demands evacuation of 2,500 Gaza children at ‘imminent risk’ of death”, *Reuters* (31 January 2025), <https://www.reuters.com/world/middle-east/un-chief-demands-evacuation-2500-gaza-children-imminent-risk-death-2025-01-30/>.

⁵²² UN OCHA, *Humanitarian Situation Update #261 | Gaza Strip* (5 February 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-261-gaza-strip>.

⁵²³ Catholic Agency for Overseas Development, *Israeli ban on UNRWA: The humanitarian needs in Gaza are staggering, UNRWA must be allowed to deliver aid* (29 January 2025), <https://reliefweb.int/report/occupied-palestinian-territory/israeli-ban-unrwa-humanitarian-needs-gaza-are-staggering-unrwa-must-be-allowed-deliver-aid>.

⁵²⁴ Israel National News - Arutz Sheva, @ArutzSheva_En, Tweet (7:15 pm, 28 January 2025), https://x.com/ArutzSheva_En/status/1884289159482966319; See also UNRWA, @UNRWA, Tweet (12:17 pm, 30 January 2025), <https://x.com/UNRWA/status/1884908790698455479>.

⁵²⁵ “Gaza ‘ceasefire at risk’ if UNRWA forced to stop operations”, *Al Jazeera* (31 January 2025), <https://www.aljazeera.com/news/2025/1/31/gaza-ceasefire-at-risk-if-unrwa-forced-to-stop-operations>.

⁵²⁶ *Ibid.*; See also Norwegian Refugee Council, *New Study Reveals Human Impact of UNRWA Ban: Lifelines to Millions at Risk* (22 January 2025), <https://reliefweb.int/report/occupied-palestinian-territory/new-study-reveals-human-impact-unrwa-ban-lifelines-millions-risk>.

⁵²⁷ Emmanuel Fabien, “IDF chief says military must prepare for ‘significant operations’ in the West Bank”, *The Times of Israel* (20 January 2025), https://www.timesofisrael.com/liveblog_entry/idf-chief-says-military-must-prepare-for-significant-operations-in-the-west-bank/; Yishai Elmakias, “Chief of Staff: ‘We must prepare for significant military operations in Judea and Samaria’”, *Makor Rishon News* (20 January 2025), <https://www.makorishon.co.il/news/810274/>.

⁵²⁸ Benjamin Netanyahu, @netanyahu, Tweet (1:46 pm, 21 January 2025), <https://x.com/netanyahu/status/1881669696736379144>.

from the method of repeated raids in Gaza,”⁵²⁹ and that Israel would “act vigorously” to “destroy the terrorist infrastructure in the Jenin refugee camp”.⁵³⁰ While Israeli diplomats suggested that Hamas was “relocate[ing] the war” to the West Bank.⁵³¹

131. On 21 January 2025, the Israeli military deployed jeeps, drones, apache helicopters, air force planes,⁵³² and military bulldozers⁵³³ in attacks on Jenin. By 2 February 2025, 25 Palestinians had been killed in Jenin since the ceasefire,⁵³⁴ most were “reportedly unarmed”.⁵³⁵ Over 20,000 Palestinians from Jenin refugee camp have been displaced; 150 – 180 homes have been damaged;⁵³⁶ schools and health services suspended;⁵³⁷ ambulances are restricted from providing their essential services;⁵³⁸ Israeli bulldozers destroyed roads and infrastructure,⁵³⁹ while Israel has carried out mass detentions.⁵⁴⁰ The intensified military assault on Jenin, the latest in a continuing and worsening series of lethal military attacks on Jenin over the last three years,⁵⁴¹ and follows a full-scale Israeli military attack in August 2024, killing 39 Palestinians.⁵⁴²
132. By 21 January 2025, the “deadly operation in Jenin” had also expanded to Tulkarm, as “Israel’s repression seems to have no end in sight. . . Palestinian people seem to have been abandoned to their fate”.⁵⁴³ The West Bank has been shut down with mass

⁵²⁹ Emanuel Fabien, “In Jenin, IDF kills 2 gunmen who shot 3 Israelis dead in terror attack this month”, *The Times of Israel* (23 January 2025), <https://www.timesofisrael.com/in-jenin-idf-kills-2-gunmen-who-shot-3-israelis-dead-in-terror-attack-this-month/>; Elisha Ben Kimon, “Katz: The operation in Jenin — the first takeaway from the system of repeated raids in Gaza”, *Ynet News* (22 January 2025), Limor Son Har-Melech MK, @limor_sonhrmelh, Tweet (11:37 pm, 30 January 2025), https://x.com/limor_sonhrmelh/status/1885079983518843263: “The Arabs of Judea and Samaria are the same as Arabs of Gaza. Their hatred is the same hatred”.

⁵³⁰ Israel Katz, @Israel_katz, Tweet (9:20 am, 23 January 2025), https://x.com/Israel_katz/status/1882327600238063644.

⁵³¹ Ambassador Avi Nir-Feldklein, @avraham_nir, Tweet (9:41 am, 22 January 2025), https://x.com/avraham_nir/status/1881970318241358285.

⁵³² Avichay Adraee, @AvichayAdraee, Tweet (7:41 pm, 24 January 2025), <https://x.com/AvichayAdraee/status/1882846290167398520>; See also Al-Haq, @alhaq_org, Tweet (3:22 pm, 21 January 2025), https://x.com/alhaq_org/status/1881693943278284862

⁵³³ Al-Haq, @alhaq_org, Tweet (3:22 pm, 21 January 2025), https://x.com/alhaq_org/status/1881693943278284862; TIMES OF GAZA, @Timesofgaza, Tweet (2:05 pm, 25 January 2025), <https://x.com/Timesofgaza/status/1883124090799804671>.

⁵³⁴ “Huge explosions rock Jenin as Israel continues operations in West Bank”, *Sky News* (2 February 2025), <https://news.sky.com/story/huge-explosions-rock-jenin-as-israel-continues-operations-in-west-bank-13301758>.

⁵³⁵ UN OCHA, *Humanitarian Situation Update #260 | West Bank* (30 January 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-260-west-bank?>; UN News, *UN rights office raises alarm over escalating violence in occupied West Bank* (24 January 2025), <https://news.un.org/en/story/2025/01/1159411>.

⁵³⁶ *Ibid.*

⁵³⁷ UNRWA, @UNRWA, Tweet (12:48 am, 26 January 2025), <https://x.com/UNRWA/status/1883466926279594021>.

⁵³⁸ UN OCHA, *Humanitarian Situation Update #264 | West Bank* (13 February 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-264-west-bank>.

⁵³⁹ “Israeli bulldozer filmed destroying roadway in occupied West Bank”, *Al Jazeera* (15 February 2025), <https://www.aljazeera.com/program/newsfeed/2025/1/24/israeli-bulldozer-filmed-destroying-roadway-in-occupied-west-bank>; UN OHCHR, *Accountability and human rights- basis of just peace in the Occupied Palestinian Territory* (28 January 2025), <https://reliefweb.int/report/occupied-palestinian-territory/accountability-and-human-rights-basis-just-peace-occupied-palestinian-territory-enar>; UN OHCHR, *UN Human Rights Office - OPT: Mass displacement of Palestinians from northern West Bank - source of growing concern* (14 February 2025), <https://reliefweb.int/report/occupied-palestinian-territory/un-human-rights-office-opt-mass-displacement-palestinians-northern-west-bank-source-growing-concern-enar>.

⁵⁴⁰ UN OCHA, *Security Council briefing by Tom Fletcher, Under-Secretary-General for Humanitarian Affairs, on the plight of children in the Gaza Strip* (23 January 2025), <https://www.ochaopt.org/content/security-council-briefing-tom-fletcher-under-secretary-general-humanitarian-affairs-plight-children-gaza-strip>.

⁵⁴¹ Al-Haq, *Action Alert: Urgent Need for Protection of Palestinians as Israel Intensifies Its Genocidal, Colonial Violence in the West Bank, including in Jenin and Tulkarem* (29 January 2025), <https://www.alhaq.org/advocacy/25868.html>.

⁵⁴² UN OHCHR, ‘No end in sight’: Israeli forces attack occupied West Bank as Gaza ceasefire takes hold, say experts (27 January 2025), <https://www.ohchr.org/en/press-releases/2025/01/no-end-sight-israeli-forces-attack-occupied-west-bank-gaza-ceasefire-takes>.

⁵⁴³ UN OHCHR, *Accountability and human rights- basis of just peace in the Occupied Palestinian Territory* (28 January 2025), <https://reliefweb.int/report/occupied-palestinian-territory/accountability-and-human-rights-basis-just-peace-occupied-palestinian-territory-enar>; UN OHCHR, ‘No end in sight’: Israeli forces attack occupied West Bank as Gaza ceasefire takes hold, say experts (27 January 2025), <https://www.ohchr.org/en/press-releases/2025/01/no-end-sight-israeli-forces-attack-occupied-west-bank-gaza-ceasefire-takes>.

movement restrictions, 53 Palestinians were killed in January,⁵⁴⁴ while violent settler arson attacks have increased,⁵⁴⁵ orders for hundreds of house demolitions have been issued for Palestinian homes in Khirbet al-Nu'man Silwan.⁵⁴⁶ Over 20 buildings were demolished by Israel in controlled explosions in Jenin Refugee Camp on 2 February 2025.⁵⁴⁷ In Tulkarm, 10-year old Saddam Rajab was shot by an Israeli soldier who threatened his father "I am the one who shot your son. God willing, he will die", while soldiers obstructed the ambulance.⁵⁴⁸

133. Steps entrenching *de facto* annexation and apartheid also continued. On 26 January 2025, the Israeli Knesset advanced a bill co-drafted by the pro-settler organisation Regavim, to facilitate the purchase of land in the West Bank by Israeli citizens.⁵⁴⁹ A bill to extend Israeli sovereignty over the West Bank was defeated in the Knesset, with parliamentarian MK Tally Gotliv assuring, "We can't vote for it just because it's right... We need to do it in a way that is reasonable and at the right time".⁵⁵⁰ As President Trump lifted United States sanctions against Israeli settlers, Minister of Finance Bezalel Smotrich announced that Israel looked forward to "expand[ing] settlement across all parts of our homeland".⁵⁵¹ Minister of Defence Israel Katz ordered the release of detained violent settlers in the West Bank "to convey a clear message of strengthening and encouraging the settlements",⁵⁵² while United Nations Experts responded that such moves are "a greenlight for more unchecked violence against the Palestinian people".⁵⁵³

Further Risks

134. It is also clear from politicians and other officials' statements made during this period that serious risks of recurring and future harm to Palestinians continue to exist, as reports are that Israel would in that event return to an aggravated assault.⁵⁵⁴ On

⁵⁴⁴ UN OCHA, *Humanitarian Situation Update #260 | West Bank* (30 January 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-260-west-bank?>

⁵⁴⁵ Yesh Din English @Yesh_Din, Tweet (1:30 pm, 22 January 2025), https://x.com/Yesh_Din/status/1882027943242735672; B'Tselem, @btselem, Tweet (4:37 pm, 20 January 2025), <https://x.com/btselem/status/1881350393625530588>.

⁵⁴⁶ Arie King @arieh_king, Tweet (12:37 pm, 26 January 2025), https://x.com/arieh_king/status/1883464327153475722.

⁵⁴⁷ "Huge explosions rock Jenin as Israel continues operations in West Bank", *Sky News* (2 February 2025), <https://news.sky.com/story/huge-explosions-rock-jenin-as-israel-continues-operations-in-west-bank-13301758>.

⁵⁴⁸ DCI-Palestine, *10-year-old Palestinian boy fatally shot in the abdomen by Israeli forces in Tulkarem* (7 February 2025), https://www.dci-palestine.org/10_year_old_palestinian_boy_in_critical_condition_after_israeli_soldier_shoots_him_in_tulkarem.

⁵⁴⁹ Sam Sokol, "Ministers back bill to let Israeli citizens directly purchase West Bank land", *The Times of Israel* (28 January 2025), [https://www.timesofisrael.com/ministers-back-bill-to-let-israeli-citizens-directly-purchase-west-bank-land/#](https://www.timesofisrael.com/ministers-back-bill-to-let-israeli-citizens-directly-purchase-west-bank-land/#;); See also Bezalel Smotrich, @bezalelsm, Tweet (8:54 pm, 26 January 2025), <https://x.com/bezalelsm/status/1883589220209766516>: "A law that corrects a historical injustice and allows Jews to purchase land and be the registered owners of land in [the West Bank]".

⁵⁵⁰ Sam Sokol, "Government defeats opposition bill to apply Israeli sovereignty to West Bank's Jordan Valley", *The Times of Israel* (22 January 2025), https://www.timesofisrael.com/liveblog_entry/government-defeats-opposition-bill-to-apply-israeli-sovereignty-to-west-banks-jordan-valley/. Likud MK Dan Illouz similarly opined that "[w]ith President Trump re-elected, we have a historic opportunity to advance Israeli sovereignty over the Jordan Valley, but it must be done wisely".

⁵⁵¹ Bezalel Smotrich, @bezalelsm, Tweet (8:28 am, 21 January 2025), <https://x.com/bezalelsm/status/1881589749464392112>.

⁵⁵² Emanuel Fabien et al., "Katz releases all settlers in administrative detention, ties it to Palestinians' release" *The Times of Israel* (17 January 2025), <https://www.timesofisrael.com/katz-says-settlers-in-administrative-detention-to-go-free-ties-it-to-palestinian-release/>.

⁵⁵³ UN OHCHR, *'No end in sight': Israeli forces attack occupied West Bank as Gaza ceasefire takes hold, say experts* (27 January 2025), <https://www.ohchr.org/en/press-releases/2025/01/no-end-sight-israeli-forces-attack-occupied-west-bank-gaza-ceasefire-takes>.

⁵⁵⁴ Daphna Liel, "Smotrich's conditions for remaining in the government", *N12* (15 January 2025), https://www.mako.co.il/news-politics/2025_q1/Article-b532c4400696491026.htm. Minister Smotrich's conditions for staying in the government in the event of a ceasefire deal were an "Advance commitment to return to combat after the 42nd day of the deal if the Hamas regime does not fall" including "[a] return to intense combat with additional military tools; [a] reduction of humanitarian aid; [p]ermanent seizure of territory in Gaza. Actions to encourage emigration."; Moran Azoulay et al., "Security Cabinet In Session, Smotrich's Demands Accepted", *Ynet News* (17 January 2025), <https://www.ynet.co.il/news/article/bkmuhdywkg>. The article notes that "the demands of the Religious Zionist Party chairman [Minister Bezalel Smotrich] regarding the IDF's return to combat were accepted".

25 January 2025, U.S. President Trump made U.S. 2,000 pound bombs available again to Israel.⁵⁵⁵ On 26 January 2025, President Trump further recommended the forcible transfer of Palestinians from Gaza, in a continuing Nakba,⁵⁵⁶ advising neighbouring countries, Jordan and Egypt — “[y]ou’re talking about a million and a half people, and we just clean out that whole thing.”⁵⁵⁷ Prime Minister Netanyahu responded to the above measures on social media stating “[t]hank you, President Trump, for keeping your promise to give Israel the tools it needs to defend itself, to confront our common enemies, and to secure a future of peace and prosperity”.⁵⁵⁸ Israeli Cabinet Ministers advised “encourage emigration now!”⁵⁵⁹ and that the proposal “is based in healthy logic”.⁵⁶⁰ Minister Smotrich welcomed the “great idea” assuring “[he] will work closely with the Prime Minister and the Cabinet to create an operative plan that will [be] implement[ed] this as soon as possible.”⁵⁶¹ On 28 January 2025, Israeli military Chief of Staff Herzi Halevi announced plans of preventing displaced Palestinians outside from returning, “Gazans will be able to exit the Rafah Crossing for Egypt, but only in a one-way direction, and [they] will not be able to return to Gaza. The Shin Bet will closely track with cameras who exits the Rafah Crossing towards Egypt”.⁵⁶² On 5 February 2025, the Israeli Minister of Defence issued an order to the military to prepare for the ‘voluntary departure’ of Gaza Palestinians.⁵⁶³

135. South Africa has drawn attention to the ongoing circumstances to highlight the continued risks faced by Palestinians in Gaza despite the ceasefire, including through the inflammatory statements by Israeli Government officials, measures and plans to prevent Palestinians from returning to Gaza, and Israeli efforts to legislate against and shutter UNRWA — without which there can be no meaningful provision of the necessary aid and basic services in Gaza, as well as to Palestine refugees in the rest of the occupied Palestinian territory — and the expansion of related violence and destruction in the West Bank.

VI. THE NEED FOR URGENT ACTION BY THIRD STATES AND THE SECURITY COUNCIL

136. The Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967 has recently emphasised that, “The Gaza genocide is a tragedy

⁵⁵⁵ Steve Holland et al., “Trump makes 2,000-pound bombs available to Israel, undoing Biden pause”, *Reuters* (26 January 2025), <https://www.reuters.com/world/us/white-house-makes-2000-pound-bombs-available-israel-undoing-bidens-pause-2025-01-25/>.

⁵⁵⁶ Al Mezan, *Al Mezan Rejects Any Proposal for Forced Population Transfer from Gaza; Reaffirms Rights of Return for Palestinian IDPs and Refugees* (28 January 2025), <https://mezan.org/en/post/46642>.

⁵⁵⁷ Betsy Klein and Lex Harvey, “Trump suggests his plan for Gaza Strip is to ‘clean out the whole thing’”, *CNN* (26 January 2025), https://edition.cnn.com/2025/01/25/politics/trump-gaza-strip-jordan-egypt/index.html?cid=ios_app; Amnesty International USA, @amnestyusa, Tweet (10:21 pm, 26 January 2025), <https://x.com/amnestyusa/status/1883611179462848518>.

⁵⁵⁸ Benjamin Netanyahu, @netanyahu, Tweet (4:39 pm, 26 January 2025), <https://x.com/netanyahu/status/1883525138769170731>.

⁵⁵⁹ Itamar Ben-Gvir, @itamarbengvir, Tweet (7:46 am, 26 January 2025), <https://x.com/itamarbengvir/status/1883390919728328723>.

⁵⁶⁰ Eli Cohen, @elicoh1, Tweet (8:14 pm, 28 January 2025), <https://x.com/elicoh1/status/1884304112004866054>.

⁵⁶¹ Bezalel Smotrich, @bezalelsm, Tweet (10:45 am, 26 January 2025), <https://x.com/bezalelsm/status/1883436051097645097>.

⁵⁶² Hezki Baruch, “Chief of Staff: Gazans will be able to leave to Egypt, but not return to Gaza”, *Israel National News (Channel 7 News)* (28 January 2025), <https://www.inn.co.il/news/659939>.

⁵⁶³ James Mackenzie and Doina Chiacu, “Trump says Israel would hand over Gaza after fighting is over, no US troops needed”, *Reuters* (7 February 2025), <https://www.reuters.com/world/middle-east/israels-defense-minister-orders-army-prepare-gaza-residents-departure-media-2025-02-06/>; Israel Katz, @Israel_katz, Tweet (9:23 am, 6 February 2025), https://x.com/Israel_katz/status/1887416931365314902.

foretold, and one that risks expanding to other Palestinians under Israeli rule.”⁵⁶⁴ As the Special Rapporteur demands, “This must stop; urgent action is required to ensure the full application of the Genocide Convention and full protection of the Palestinians.”⁵⁶⁵

137. The publicly available evidence of Israel’s year-long genocidal campaign, as set out in this Dossier, is clear. Israel is continually and systematically breaching the Genocide Convention and the provisional measures ordered by the International Court of Justice, which were meant to forestall those breaches.⁵⁶⁶ Israeli’s actions are also gross and systematic violations of the peremptory norm prohibiting genocide.⁵⁶⁷ They are an affront to the world’s shared humanity. They engage the responsibility and obligations of all states.⁵⁶⁸
138. As this Dossier shows, Israel has also continued to ignore United Nations Resolutions, to kill United Nations personnel, to attack the integrity of UN officials, including the Secretary-General and to conduct strikes on United Nations facilities, including the United Nations peace-keeping mission in Southern Lebanon.⁵⁶⁹ On 31 December 2024, the United Nations Secretary-General highlighted Israel’s persistent non-compliance further in his written assessment on the implementation of United Nations General Assembly resolution ES-10/26.⁵⁷⁰ Israel commits these acts in full defiance of its obligations under the United Nations Charter, and of the international rule of law in general.
139. As Judge Yusuf emphasised in his Declaration to the International Court of Justice’s Order of 28 March 2024: “The alarm has now been sounded by the Court. All the indicators of genocidal activities are flashing red in Gaza.”⁵⁷¹ Since the ceasefire in

⁵⁶⁴ UNGA, *Report of the Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967*, Francesca Albanese, *Genocide as colonial erasure*, UN Doc A/79/384 (1 October 2024), <https://undocs.org/A/79/384>, pp. 30-31, para 83.

⁵⁶⁵ *Ibid*, p. 31, para. 86.

⁵⁶⁶ For example, Amnesty International has concluded that “it strains belief” that “Israel’s direct attacks on civilians and civilian objects and indiscriminate strikes ... could be anything other than intentional after so many months of recurring attacks, in defiance of legally binding orders by the ICJ, multiple resolutions of the UN Security Council and numerous warnings”. Amnesty International, *‘You Feel Like You Are Subhuman’: Israel’s Genocide Against Palestinians in Gaza*, 281.

⁵⁶⁷ The prohibition on genocide is a peremptory norm of general international law (as are the basic rules of international humanitarian law), in this regard see: *Draft Conclusions on identification and legal consequences of peremptory norms of general international law (ius cogens), with commentaries*, adopted by the International Law Commission, annexed to the UNGA as part of the Commissions’ report covering the work of that session (A/77/10), 2022, https://legal.un.org/ilc/texts/instruments/english/commentaries/1_14_2022.pdf, pp. 87 and 89.

⁵⁶⁸ Responsibility of States for Internationally Wrongful Acts, adopted by the International Law Commission, annexed to the UNGA Resolution 56/83, 12 December 2001, https://legal.un.org/ilc/texts/instruments/english/draft_articles/9_6_2001.pdf, Art. 40 and 41; See also the Genocide Convention relative to the Protection of Civilian Persons in Time of War, Art. 8. See also Legal Consequences Arising from the Policies and Practices of Israel in the Occupied Palestinian Territory, Including East Jerusalem, Advisory Opinion, I.C.J. Reports 2024, (19 July 2024), <https://www.icj-cij.org/sites/default/files/case-related/186/186-20240719-adv-01-00-en.pdf>, p. 76, para. 279 which states: “the Court considers that, in view of the character and importance of the rights and obligations involved, all States are under an obligation not to recognize as legal the situation arising from the unlawful presence of Israel in the Occupied Palestinian Territory. They are also under an obligation not to render aid or assistance in maintaining the situation created by Israel’s illegal presence in the Occupied Palestinian Territory. It is for all States, while respecting the Charter of the United Nations and international law, to ensure that any impediment resulting from the illegal presence of Israel in the Occupied Palestinian Territory to the exercise of the Palestinian people of its right to self-determination is brought to an end. In addition, all the States parties to the Fourth Geneva Convention have the obligation, while respecting the Charter of the United Nations and international law, to ensure compliance by Israel with international humanitarian law as embodied in that Convention.”

⁵⁶⁹ Giovanna Coi, “40 countries ‘strongly condemn’ Israeli attacks on UN peacekeepers”, *Politico* (13 October 2024), <https://www.politico.eu/article/40-countries-condemn-israel-attacks-un-peacekeepers-lebanon/>.

⁵⁷⁰ See UN Secretary-General, *Letter to the President of the UNGA in response to General Assembly resolution ES-10/26, adopted on 11 December 2024* (31 December 2024), https://www.un.org/pga/wp-content/uploads/sites/109/2025/01/EOSG-2024-08825_SG-Letter-to-PGA-Written-Assessment-Gaza-ceasefire-resolution_SIGNED.pdf.

⁵⁷¹ *South Africa v. Israel*, Provisional Measures, Order of 28 March 2024, Declaration of Judge Yusuf, <https://www.icj-cij.org/sites/default/files/case-related/192/192-20240328-ord-01-02-en.pdf>, p. 3, para. 12.

Gaza, Israel's escalating attacks in the West Bank are of particular concern and are raising their own alarms.⁵⁷²

140. As the Commission of Inquiry has recently advised, in relation to the responsibility of states, given Israeli's atrocities in Gaza:

"The Commission notes, for violations of international humanitarian law, it has already reported that Israel has committed war crimes in the context of the war in Gaza since 7 October 2023. On the issue of genocide, the Commission notes the provisional measures orders issued by the Court in the *Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (South Africa v. Israel)*. The Commission finds that all States are on notice that Israel may be or is committing internationally wrongful acts in both its conduct in the military operations in Gaza and its unlawful occupation of the West Bank, including East Jerusalem. Thus, the Commission finds that, unless States cease their aid and assistance to Israel in the commission of these acts, those States shall be deemed to be complicit in those internationally wrongful acts."⁵⁷³

141. The International Law Commission has similarly emphasised the importance of collective action, precisely when the world is faced with a flagrant breach of peremptory norms, as Israel's genocidal campaign in Gaza is. The International Law Commission has made clear that:

"The obligation of States to act collectively to bring to an end serious breaches of peremptory norms of general international law (*jus cogens*) has particular consequences for cooperation within the organs of the United Nations and other international organizations. It means that, in the face of serious breaches of peremptory norms of general international law (*jus cogens*), international organizations should act, within their respective mandates and when permitted to do so under international law, to bring to an end such breaches. Thus, where an international organization has the discretion to act, the obligation to cooperate imposes a duty on the members of that international organization to act with a view to the organization exercising that discretion in a manner to bring to an end the breach of a peremptory norm of general international law (*jus cogens*)."⁵⁷⁴

142. The recent report of the United Nations Special Committee to Investigate Israeli Practices Affecting the Human Rights of the Palestinian People and Other Arabs of the Occupied Territories, is of particular import. It makes recommendations for urgent action by the United Nations General Assembly and its member states, Israel and to businesses and investors operating with Israel that, in any way, assist in maintaining the unlawful situation in the Occupied Palestinian Territory.⁵⁷⁵

143. In addition to recommending that States implement their *erga omnes* obligations under international law, the Special Committee calls upon States to urgently:

⁵⁷² See e.g., UN OCHA, *Humanitarian Situation Update #260 | West Bank* (30 January 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-260-west-bank>; Osama Abu Rabee, @dn_osama_rabee, Tweet (3:59 pm, 2 February 2025), https://x.com/dn_osama_rabee/status/1886051856155103259.

⁵⁷³ UN Commission of Inquiry, *Legal analysis and recommendations on implementation of the International Court of Justice, Advisory Opinion re: Legal Consequences arising from the Policies and Practices of Israel in the Occupied Palestinian Territory, including East Jerusalem* (18 October 2024), https://www.un.org/unispal/document/position-paper-commissionof-inquiry-18oct24/#_bookmark17, para. 23.

⁵⁷⁴ *Draft Conclusions on identification and legal consequences of peremptory norms of general international law (jus cogens), with commentaries*, adopted by the International Law Commission, annexed to the UNGA as part of the Commissions' report covering the work of that session (A/77/10), 2022, https://legal.un.org/ilc/texts/instruments/english/commentaries/1_14_2022.pdf, pp. 75 - 76.

⁵⁷⁵ UNGA, *Report of the Special Committee to Investigate Israeli Practices Affecting the Human Rights of the Palestinian People and Other Arabs of the Occupied Territories*, A/79/363 (20 September 2024), <https://undocs.org/A/79/363>, pp. 26–27, paras. 71–73.

- “(b) Leverage their influence to ensure Israel ceases its policies and practices negatively affecting the human rights of the Palestinian people and other Arabs of the occupied territories;
 - (c) Halt all offensive arms transfers, including weapons, explosives, guns and/or ammunition, to Israel;
 - (d) Hold nationals, including those with dual Israeli citizenship, involved in settler violence or violations in Gaza, accountable for violations of international law;
 - (e) Review financial transfer policies that allow religious and charitable organizations to fund activities in Israel, which enable the further sustenance of an apartheid system;
 - (f) Support UNRWA politically and financially, including by increasing funding through the United Nations regular budget;
 - (g) Protect and ensure respect for human rights in economic activities, including by setting out clear expectations for businesses in terms of responsible conduct consistent with the Guiding Principles on Business and Human Rights, and exercising heightened due diligence when supporting business enterprises;
 - (h) Hold business entities fully accountable for complicity in violations of international law, whether through their supply of arms, provision of digital products and services and/or engagement in technology transfer and facilitation (including artificial intelligence) or links to value chains (including algorithmic-based decision making-systems) that enable Israel’s ongoing onslaught in Gaza and apartheid system of injustice in the occupied West Bank, including East Jerusalem;
 - (i) Give full effect to the advisory opinion of the International Court of Justice of 19 July, by adhering to the legal obligations outlined by the Court, and considering specific measures or further measures required to put an end to the illegal presence of Israel in the occupied territories;
 - (j) Fully cooperate with the International Criminal Court.”⁵⁷⁶
144. The United Nations Security Council has the primary responsibility to maintain international peace and security.⁵⁷⁷
 145. The Security Council has remained seized of this matter for the last year. However, the genocidal acts continue.
 146. States and the Security Council must take urgent and decisive steps to ensure that Israel ends its military campaign and withdraws fully from Gaza; allows humanitarian aid, at scale, to enter Gaza unimpeded; and to ensure that Israel is given no military or other assistance that would facilitate its ongoing destruction of Gaza and the West Bank, including East Jerusalem, and the Palestinian people whose land it is.
 147. Now is the time for urgent action by all states, collectively and individually, to protect the peremptory norms of international law and the foundational purpose of the United Nations Charter.

⁵⁷⁶ *Ibid*, p. 26, para. 71.

⁵⁷⁷ UN Charter, Chapter V, Art. 24(1)

ANNEX I

STATEMENTS EVIDENCING GENOCIDAL INTENT AND INCITEMENT TO GENOCIDE BY SENIOR ISRAELI GOVERNMENTAL OFFICIALS

1. Evidence of Israeli State officials' incitement to genocide as well as specific intent (*'dolus specialis'*) to commit and persist in committing genocidal acts or to fail to prevent them has been significant and overt since October 2023. The statements of intent — when combined with the level of killing, maiming, displacement and destruction on the ground, together with the multiple levels of siege of Gaza and restrictions on humanitarian assistance — evidence an unfolding and continuing genocide that is directed and encouraged by Israeli officials and perpetrated in Gaza by and on behalf of Israel. They include statements by individuals in positions of the highest responsibility within the Israeli government, including members of the Israeli Ministerial Committee on National Security Affairs ('Security Cabinet'), and members of the current War Forum and prior — now defunct — War Cabinet.

2. Israel's Security Cabinet is responsible for, *inter alia* "defining the strategic goals of military operations" and "providing policy guidelines to military leaders, while indicating the objectives that should be achieved by the end of the military campaign, and underscoring the limits that have to be respected while the campaign is ongoing".¹ Between 16 October 2023 and 16 June 2024, Israel also managed its military offensive on Gaza by way of a three-person War Cabinet, which was responsible for "the realization and implementation of the security cabinet's decisions".² On 10 September 2024, the War Cabinet was replaced with a seven-member 'War Forum', which would "manage the war".³ However, the Prime Minister has stressed that "the essential decisions are approved by the entire Security Cabinet — It hasn't changed and it's not about to change".⁴ On 5 November 2024, the Prime Minister fired Minister of Defence Yoav Gallant, with the previous Minister of Energy and Infrastructure (29 December 2022 – 1 January 2024) and Minister of Foreign Affairs (1 January 2024 – 8 November 2024), Israel Katz, becoming the new Minister of Defence. On 19 January 2025, the Otzma Yehudit party left the governing coalition.⁵

3. On 7 November 2024, the outgoing Minister of Defence Yoav Gallant stated that the considerations preventing Israel from accepting a ceasefire were "not military nor diplomatic" and that there was no security need for Israeli forces to stay in Gaza and continue their onslaught on Gaza as "everything that could be achieved by force — we achieved".⁶ These statements constitute crucial background against which to assess the utterances of Israeli senior public officials.

4. The statements outlined in this Annex also include statements specifically directed against UNRWA. As part of Israel's destruction of Palestinians as a protected

¹ Amichai Cohen and Yuval Shany, "Israel's War Cabinet: A Brief History of War Powers and Institutional Ambiguity", *Israel Democracy Institute* (14 November 2023), <https://en.idi.org.il/articles/51509>.

² *Ibid.*

³ "Netanyahu forms seven-member forum to manage war", *JNS* (11 September 2024), <https://www.jns.org/netanyahu-forms-seven-member-forum-to-manage-war/>; "[t]he ministers participating in the new forum are Netanyahu, Defense Minister Yoav Gallant [prior to his exit from government], Strategic Affairs Minister Ron Dermer, Shas Party Chairman Aryeh Deri, Foreign Minister Israel Katz, Justice Minister Yariv Levin and Finance Minister Bezalel Smotrich." See also "Netanyahu's New 'Cabinet': Ben-Gvir Is Out – Smotrich Is In", *Makor Rishon* (11 September 2024), <https://www.makorrishon.co.il/news/784046/>.

⁴ "Trying to Solve the Coalitions Crisis: Negotiations Between Ben-Gvir and Netanyahu Over the Creation of a Limited Security Cabinet", *Walla News desk* (23 July 2024), <https://news.walla.co.il/item/3679899>.

⁵ Sam Sokol, "Otzma Yehudit exits coalition over Gaza deal, blasting it as 'victory for terrorism'", *Times of Israel* (19 January 2025), <https://www.timesofisrael.com/otzma-yehudit-exits-coalition-over-gaza-deal-blasting-it-as-victory-for-terrorism/>.

⁶ Michal Peilan and Yulan Cohen, "Gallant Tells All: 'Netanyahu decides by himself, I wasn't able to influence' | New quotes", *Mako News* (7 November 2024), https://www.mako.co.il/news-israel/2024_q4/Article-b60fe568a270391026.htm; "Exiting stage, Gallant tells hostage families IDF has no reason to remain in Gaza", *The Times of Israel* (7 November 2024), https://www.timesofisrael.com/liveblog_entry/exiting-stage-gallant-tells-hostage-families-idf-has-no-reason-to-remain-in-gaza/.

group under the Genocide Convention, Israel has conducted a campaign to undermine, attack, and ultimately end UNRWA's operations.

5. A number of statements quoted in this Annex were also cited by the International Court of Justice ('ICJ') in its January Order as part of the "facts and circumstances" giving rise to its indication of provisional measures against Israel in light of the real and imminent risk of irreparable harm to the rights under the Genocide Convention which it found to be "plausible".⁷ Those rights include the right of Palestinians in Gaza to be protected from acts of genocide and related prohibited acts identified in Article III of the Genocide Convention, and the right of South Africa to seek Israel's compliance with its obligations under the Convention.⁸

6. Instead of publicly and comprehensively retracting and repudiating those statements, including since the January Order, the Israeli President, Prime Minister and other Ministers — including members of Israel's Security Cabinet and the prior War Cabinet and members of the current War Forum — have continued to issue such genocidal statements against the Palestinian people in Gaza.

7. Israel's State Attorney has since also made it clear he has advised against criminal investigation of Ministers and MKs for their statements in relation to Israel's assault on Palestinians in Gaza, and that there will be no criminal indictments for any of the incitement by Israeli leaders and senior public officials contained in the statements below.⁹

President of Israel, Isaac Herzog

8. Statements by the Israeli President, Isaac Herzog, dehumanising Palestinians, evidencing genocidal intent, and inciting genocide include the following:

- On 12 October 2023, the President made clear that Israel was not distinguishing between militants and civilians in Gaza, stating in a press conference to foreign media in relation to Palestinians in Gaza, over one million of whom are children:

"We have to understand there's a State, there's a State in a way that has built a machine of evil right at our doorstep. It's an entire nation out there that is responsible. It is not true this rhetoric about civilians not aware, not involved. It is absolutely not true. They could have risen up. They could have fought against that evil regime which took over Gaza in a coup d'état. Murdering their family members who were in Fatah. There's a short memory in the world. Israel evacuated Gaza, unilaterally. In order to show that it is willing to make peace, I was a member of that Cabinet. We said to our nation this will be Hong Kong of the Middle East. Well, reality has turned into a tragedy. Therefore I must say that this situation impacts the entire vision of people as to their ability to adhere to the same old rhetoric. We are working, operating militarily according to rules of international law. Unequivocally. But we are at war. We are at war. We are at war. We are defending our homes. We are protecting our homes. That's the truth. And when a nation protects its home, it fights. And we will fight until we'll break their backbone."¹⁰

⁷ *South Africa v. Israel, Provisional Measures, Summary of the Order of 26 January 2024*, pp. 5-7.

⁸ *South Africa v. Israel, Provisional Measures, Order of 26 January 2024*, pp. 17-18, paras. 52-54.

⁹ "State attorney clarifies no ongoing probes against Eyal Golan, others for incitement", *The Times of Israel* (20 August 2024), <https://www.timesofisrael.com/report-state-attorney-sought-probe-of-likud-mk-for-gaza-incitement/>; Chen Maanit, "State Prosecutor Advises Against Probing Israeli Ministers, MKs Who Called to Harm Gazans", *Haaretz* (19 August 2024), <https://www.haaretz.com/israel-news/2024-08-19/ty-article/.premium/state-prosecutor-advises-against-probing-israeli-ministers-mks-who-called-to-harm-gazans/00000191-6c00-d1ee-afb5-6e39b4a30000>.

¹⁰ Office of the President of Israel, @IsraelPresident, Tweet (10:13 am, 12 October 2023), <https://x.com/IsraelPresident/status/1712380955669758455> [19:00]. See also, President of Israel, Isaac Herzog, Facebook (12 October 2023), https://www.facebook.com/IsaacHerzog/videos/278073995128781/?extid=CL-UNK-UNK-UNK-IO5_GK0T-GK1C&ref=sharing&mibextid=I6GtW.

- On 15 October 2023, he told foreign media that Israel is “faced with an extremely cruel, inhumane enemy, which we have to uproot, with no mercy . . . [T]he story is not Israel versus Palestinians, or Judaism versus Islam, God forbid. The story is about human, humanity. Are we with the good, or are we with evil. That’s where humanity should stand, and the battle that we are carrying out now, as a nation, rising up as a lion, is against evil. And we will uproot evil, so that there will be good for the entire region and the world. For the last two years we enabled a huge economic growth in Gaza, for the first time we enabled tens of thousands of Palestinians from Gaza to work in Israel, to break bread, to enjoy life, what happened? There is no justification, it is simply an ISIS-type ideology that wants to eliminate us off the ground, and therefore they need to be eliminated off the ground.”¹¹
- On 27 August 2024, in a speech for an Israeli settlement Council’s in the West Bank ceremony honouring field security officers, the President stated “[s]ettlement has existed since the dawn of Zionism. They are inseparable . . . Settlement is essential to the Israeli Nation and to the security of Israel.”¹² Praising the settlement movement in the West Bank, he said “The new communities movement has existed since the dawn of Zionism, and one is an integral part of the other. Now is an opportunity to state how these communities have proven and constantly continue to prove who essential they are to the Jewish People and Israel’s security.”¹³

9. The Israeli President’s 12 October 2023 statement was expressly cited by the International Court of Justice in its January Order indicating provisional measures against Israel.¹⁴ While the President has subsequently attempted to distance himself from his statement — including in a ‘paywalled’ article in the United States’ newspaper the Wall Street Journal — in an attempt to burnish his reputation internationally, he has made no effort to retract such statements domestically, whether to Israeli troops in Gaza or to Israeli civil society more generally.¹⁵ That is notwithstanding that Israeli soldiers committing atrocities on the ground in Gaza continue to directly invoke his words that there are no “uninvolved civilians”.¹⁶

Prime Minister of Israel, Benjamin Netanyahu
Chair of the Israeli Security Cabinet and Member of the Israeli War Forum

10. Israeli Prime Minister, Benjamin Netanyahu, is the Chairman of the Israeli Security Cabinet and member of the former Israeli War Forum, in addition to being head of the Israeli government and Chairperson of the Likud Party — the majority party in the governing coalition. He was also a member of the now-defunct three-person War Cabinet. On 21 November 2024, an arrest warrant was issued against him by the Pre-Trial Chamber I of the International Criminal Court, including for the war crimes of starvation as a method of warfare and intentionally directing an attack against the civilian population; and the crimes against humanity of murder,

¹¹ Isaac Herzog, @Isaac_Herzog, Tweet (11:00 pm, 15 October 2023), https://twitter.com/Isaac_Herzog/status/1713661051986678189.

¹² Khaled Yousry, @KhaledYousry22, Tweet (11:40 am, 28 August 2024), <https://x.com/KhaledYousry22/status/1828729431189291460>; Hezki Baruch, “President Herzog: ‘Settlements are essential for Israel’s security’”, *Israel National News* (27 August 2024), <https://www.israelnationalnews.com/news/395262>.

¹³ *Ibid.*

¹⁴ *South Africa v. Israel, Provisional Measures, Order of 26 January 2024*, pp. 17-18, para. 52.

¹⁵ Isaac Herzog, “The Case Against Israel Rests on Lies: Among them is a quote of mine that South Africa grossly distorted in its presentation to the ICJ”, *Wall Street Journal* (11 February 2024), <https://www.wsj.com/articles/the-case-against-israel-rests-on-lies-the-hague-south-africa-genocide-gaza-bc7c264c>. See, President Herzog’s justification of his statements — as opposed to retraction — for the domestic audience, Israeli President, *The President’s remarks at the Bible Circle in memory of 929 CEO Moshe Ohion and his son Eliad* (28 January 2024), [https://www.president.gov.il/משה-929-מנכ"ל-של-לזכרו-תנך-לזכרו-מנכ"ל-929-משה](https://www.president.gov.il/משה-929-מנכ) (Hebrew, as a remark at a Bible study circle). See also Israeli Ministry of Foreign Affairs, *President Herzog addresses ICJ Ruling* (28 January 2024), <https://www.gov.il/en/departments/news/president-herzog-addresses-icj-ruling-28-jan-2024> (English).

¹⁶ See Annex II: GENOCIDAL INTENT AND INCITEMENT TO GENOCIDE BY ISRAELI MILITARY OFFICIALS.

persecution, and other inhumane acts, in the context of Israel's creation of "conditions of life calculated to bring about the destruction of part of the civilian population in Gaza".¹⁷ Illustrative examples of statements the Israeli Prime Minister has made since 7 October 2023 dehumanising Palestinians and evidencing genocidal intent and inciting genocide against Palestinians include the following:

- On 7 October 2023, in a televised address that was published on the Prime Minister's official X account and as a statement on the official Ministry of Foreign Affairs website, he warned Palestinians that: "All of the places where Hamas is mobilizing, [in] that wicked city — all the places it hides in and operates from — we will turn them into rubble. I say to the residents of Gaza: get out of there now because we will operate everywhere in full force".¹⁸
- On 9 October 2023, in a televised address in English, he warned: "We have killed many terrorists and this is not going to stop. I said that any place from which Hamas operates will turn into rubble. This is already happening today and it will continue happening even more so . . . But I promise you dear citizens, by the end of the war all our enemies will know it was a terrible mistake to attack Israel. What we will do to our enemies in the next few days will echo for generations".¹⁹
- On 13 October 2023, he confirmed that "[w]e are striking our enemies with unprecedented force. . .".²⁰
- On 16 October 2023, in a formal address to the Knesset, he described the situation as "a struggle between the children of light and the children of darkness, between humanity and the law of the jungle ["between humanity and bestiality" in the Hebrew language statement]"²¹ — a dehumanising theme to which he returned on numerous occasions.
- On 17 October 2023, in a joint press conference with the visiting Prime Minister of Romania, he asserted that Israel was "not fighting just our war, we're fighting the war of all civilized countries and all civilized peoples."²²
- On 18 October 2023, in an address from Israel's military headquarters in Tel Aviv to Israeli citizens, he stated: "we will not allow humanitarian assistance in the form of food and medicines from our territory to the Gaza Strip".²³ That same day, the World Food Programme ('WFP') had warned that "the dire humanitarian

¹⁷ International Criminal Court ('ICC'), *Situation in the State of Palestine: ICC Pre-Trial Chamber I rejects the State of Israel's challenges to jurisdiction and issues warrants of arrest for Benjamin Netanyahu and Yoav Gallant* (21 November 2024), <https://www.icc-cpi.int/news/situation-state-palestine-icc-pre-trial-chamber-i-rejects-state-israels-challenges>. See also, ICC, *Statement of ICC Prosecutor Karim A.A. Khan KC: Applications for arrest warrants in the situation in the State of Palestine* (20 May 2024), <https://www.icc-cpi.int/news/statement-icc-prosecutor-karim-aa-khan-kc-applications-arrest-warrants-situation-state>; Panel of Experts in International Law Convened by the Prosecutor of the ICC, *Report of the Panel of Experts in International Law* (20 May 2024), <https://www.icc-cpi.int/sites/default/files/2024-05/240520-panel-report-eng.pdf>.

¹⁸ Prime Minister of Israel, @IsraeliPM, Tweet (10:31 pm, 7 October 2023), <https://twitter.com/IsraeliPM/status/1710769906373775373>.

¹⁹ Sky News, @skynews, TikTok (9 October 2023), <https://www.tiktok.com/@skynews/video/7288035227845414177>.

²⁰ "Address by the Prime Minister of Israel", *Israeli PM* (13 October 2023), <https://www.youtube.com/watch?v=T4HXaZ20M6Q>. Translation in "'Only the beginning' says Netanyahu as Israel makes first raids into Gaza", *Reuters* (13 October 2023), <https://www.reuters.com/world/middle-east/now-is-time-war-says-israels-military-chief-2023-10-12/>.

²¹ Israel Ministry of Foreign Affairs, *Press Release: Excerpt from PM Netanyahu's remarks at the opening of the Winter Assembly of the 25th Knesset's Second Session* (16 October 2023), <https://www.gov.il/en/departments/news/excerpt-from-pm-netanyahu-s-remarks-at-the-opening-of-the-knesset-s-winter-assembly-16-oct-2023>, published in Hebrew at Israel's Prime Minister Office, @IsraeliPM_heb, Tweet (5:01 pm, 16 October 2023), https://x.com/IsraeliPM_heb/status/1713933085752934743.

²² Prime Minister of Israel, @IsraeliPM, Tweet (3:23 pm, 17 October 2023), <https://x.com/IsraeliPM/status/1714270930569216041>. Hebrew available at, Prime Minister's Office, Government Press Office, *Prime Minister Benjamin Netanyahu met with Romanian Prime Minister Marcel Ciolacu* (17 October 2023), <https://www.gov.il/he/pages/ironswords171020231>.

²³ Ministry of Foreign Affairs, *Statement by PM Netanyahu* (18 October 2023), <https://www.gov.il/en/pages/pm-netanyahu-statement-18-oct-2023>, published in Hebrew at Israel's Prime Minister Office, @IsraeliPM_heb, Tweet (4:28 pm, 18 October 2023), https://x.com/IsraeliPM_heb/status/1714649568216838550.

situation in Gaza is aggravating by the hour” and that “the scarcity of water, power, food, and medicine supplies is putting people’s lives in jeopardy”.²⁴

- On 28 October 2023, as Israeli forces prepared their land invasion of Gaza, he invoked the Biblical tale of the total destruction of Amalek by the Israelites, calling on Israelis to: “remember what Amalek did to you, we were commanded. We remember and we fight.”²⁵ As explained by Israeli non-governmental organisation B’Tselem, a reference in Israel to ‘Amalek’ is: “a dog whistle that anyone who has gone through Israel’s education system will recognize as meaning a response to an attack in a way that would obliterate any memory of that nation, women and children included. When the fight against Hamas is compared to the war against Amalek, the conclusion is clear: The order is to wipe out Gaza”.²⁶ Notably, Biblical references to Amalek include: “Remember what Amalek did to you on your journey, after you left Egypt . . . Therefore, when your God grants you safety from all your enemies around you, in the land that your God is giving you as a hereditary portion, you shall blot out the memory of Amalek from under heaven. Do not forget!”,²⁷ and (*God to King Saul*) “go, attack Amalek, and proscribe all that belongs to him. Spare no one, but kill alike men and women, infants and sucklings, oxen and sheep, camels and asses!”,²⁸ As set out in Annex II, Israeli soldiers — who have laid waste to Gaza, killing over 43,391 Palestinians — of which the majority are women, children and infants²⁹ — alongside cattle,³⁰ have themselves invoked “Amalek” in so doing.³¹
- On 3 November 2023, in a letter to Israeli soldiers and officers published on the platform ‘X’ (formerly Twitter), he again invoked the Biblical tale of Amalek, writing that “We have always fought bitter enemies who rose up to destroy us. Equipped with fortitude and righteousness of our way, we have stood determined against those who sought after our souls. Our current struggle against the Hamas murderers is another chapter in the story of our national resilience through the ages”, calling on Israeli soldiers to “[r]emember what Amalek did to you.”³² He told Israeli soldiers that “[t]his is a war between the sons of light and the sons of darkness. We will not cease our mission until the

²⁴ World Food Program (‘WFP’), *WFP Palestine Emergency Response External Situation Report 3* (18 October 2023), https://www.un.org/unispal/wp-content/uploads/2023/10/WFP-Palestine-Emergency-Response-External-Situation-Report-3_18-October-2023.pdf.

²⁵ “Address by the Prime Minister of Israel”, *IsraeliPM* (28 October 2023), <https://www.youtube.com/watch?v=IIPkoDk6isc>, see also “Israel-Hamas war: ‘We will fight and we will win’, says Benjamin Netanyahu”, *Sky News* (28 October 2023), <https://news.sky.com/video/israel-hamas-war-we-will-fight-and-we-will-win-says-benjamin-netanyahu-12995212>.

²⁶ B’Tselem, *Manufacturing Famine: Israel is Committing the War Crime of Starvation in the Gaza Strip* (April 2024), https://www.btselem.org/publications/202404_manufacturing_famine.

²⁷ Sefaria, Deuteronomy 25:17-19, JPS, 1985, <https://www.sefaria.org/Deuteronomy.25.19>.

²⁸ Sefaria, I Samuel 15:3, see also I Samuel 15:1-35, JPS, 1985, https://www.sefaria.org/I_Samuel.15.3. See also Sefaria, Leviticus 27:28-29, JPS, 1985, <https://www.sefaria.org/Leviticus.27.29>: “But of all that anyone owns, be it human or beast or land-holding, nothing that has been proscribed for the Lord may be sold or redeemed; every proscribed thing is totally consecrated to the Lord. No human being who has been proscribed can be ransomed: that person shall be put to death”.

²⁹ United Nations Office for Coordination of Humanitarian Affairs (‘UN OCHA’), *Reported impact snapshot | Gaza Strip* (5 November 2024) (5 November 2024), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-5-november-2024>; UN News, *Most of Gaza’s 40,000 dead are women and children, says UN rights chief* (15 August 2024), <https://news.un.org/en/story/2024/08/1153216>; UN News, *Gaza: Possible atrocity crimes unfold, new UN report warns* (8 November 2024), <https://news.un.org/en/story/2024/11/1156716>.

³⁰ Gaza Notifications, @gazanotice, Tweet (5:08 pm, 17 August 2024), <https://x.com/gazanotice/status/1824825521487966303>; Al Jazeera English, @AJEnglish, Tweet (4:45 pm, 7 February 2024), <https://x.com/AJEnglish/status/1755258808161448284>.

³¹ See Annex II: GENOCIDAL INTENT AND INCITEMENT TO GENOCIDE BY ISRAELI MILITARY OFFICIALS.

³² *South Africa v. Israel, Application and Request for Provisional Measures of 29 December 2023*, p. 60, para.101; Prime Minister’s Office in Hebrew, @IsraeliPM_heb, Tweet (1:43 pm, 3 November 2023), https://twitter.com/IsraeliPM_heb/status/1720406463972004198.

light overcomes the darkness — the good will defeat the extreme evil that threatening us and the entire world.”³³

- On 5 December 2023, at a press conference with Defence Minister Yoav Gallant and Minister Benny Gantz, he stated that Israeli “soldiers will bring light to the darkness, in the alleyways of Gaza, in the ruins of Sajaiya [sic], in the terrorist lairs in Khan Yunis. The lights together, as a great light, will cleave the darkness.”³⁴
- On 24 December 2023, he returned to his dehumanising theme in his ‘Christmas message’, stating: “[w]e’re facing monsters, monsters who murdered children in front of their parents . . . This is a battle, not only of Israel against these barbarians, it’s a battle of civilization against barbarism”.³⁵
- On 25 December 2023, he confirmed in a Likud party meeting — in response to a question by Likud MK Danny Danon who has actively advocated for the transfer of Palestinians out of Gaza³⁶ — that he is working on plans for the “voluntary emigration” of Palestinians from Gaza,³⁷ stating “[o]ur problem is [finding] countries that are willing to absorb Gazans, and we are working on it”.³⁸ He had previously made clear that he has no intention of allowing Palestinians to control Gaza, stating: “After we’ve fought and done this whole thing we’re supposed to hand over the [Gaza] Strip to them [the Palestinian Authority]?”.³⁹
- On 24 January 2024, he ‘tweeted’ in relation to the Israeli army’s destruction in November 2023 of the Palestinian Legislative Council Building in Gaza⁴⁰ that “[t]here is no real parliament in Gaza. That is why the parliament of extremism and hatred being destroyed by our forces is an image of victory. It is a powerful image, a very symbolic one, in a long and difficult campaign”.⁴¹
- On 30 January 2024 — addressing students in the ‘Israeli Defence Force preparation program’ at the ‘Bnei David’ (‘Sons of David’) pre-military religious academy in the illegal Israeli West Bank settlement of Eli — he again described Israel’s military operation in Gaza as one “between the sons of light

³³ Prime Minister’s Office in Hebrew, @IsraeliPM_heb, Tweet (1:44 pm, 3 November 2023), https://twitter.com/IsraeliPM_heb/status/1720406469055500583.

³⁴ Israel Prime Minister’s Office, Statement by PM Netanyahu (5 December 2023), <https://www.gov.il/en/departments/news/event-press051223>, published in Hebrew to the same effect at Israel’s Prime Minister Office, @IsraeliPM_heb, Tweet (10:56 pm, 5 December 2023), https://x.com/IsraeliPM_heb/status/1732142010453176321.

³⁵ Israel Ministry of Foreign Affairs, *Christmas message from PM Netanyahu* (24 December 2023), <https://www.gov.il/en/departments/news/christmas-message-from-pm-netanyahu-24-dec-2023>.

³⁶ See, e.g., MK Danny Danon (Likud) and MK Ram Ben-Barak (Yesh Atid), “The West Should Welcome Gaza Refugees”, *The Wall Street Journal* (13 November 2023), <https://www.wsj.com/articles/the-west-should-welcome-gaza-refugees-asylum-seekers-amas-terrorist-displacement-5d2b5890>.

³⁷ Ariel Kahana, “Netanyahu: Working for voluntary immigration of Gazans from the Gaza Strip”, *Israel Hayom* (25 December 2023), <https://www.israelhayom.co.il/news/geopolitics/article/15002089>.

³⁸ Shalom Yerushalmi, “Israel in talks with Congo and other countries on Gaza ‘voluntary migration’ plan”, *The Times of Israel* (3 January 2024), <https://www.timesofisrael.com/israel-in-talks-with-congo-and-other-countries-on-gaza-voluntary-migration-plan/>.

³⁹ Itamar Eichner, “Netanyahu, in the shadow of the introduction of fuel: ‘We fended off pressure from the world, we need a political iron dome’”, *Ynet* (18 November 2023), <https://www.ynet.co.il/news/article/hksy6ui4p>.

⁴⁰ *South Africa v. Israel, Application and Request for Provisional Measures of 29 December 2023*, p. 55, para. 89; Eve Brennan and Gianluca Mezzofiore, “Satellite images show Gaza’s Palestinian Legislative Council building partially destroyed”, *CNN* (18 November 2023), https://edition.cnn.com/middleeast/live-news/israel-amas-war-gaza-news-11-18-23/h_815f9ef2d2a63cc4c840d095067e8f1d; “IDF soldiers share photo in conquered Hamas parliament”, *The Jerusalem Post* (13 November 2023), <https://www.jpost.com/breaking-news/article-773089>.

⁴¹ Prime Minister of Israel, @IsraeliPM, Tweet (5:07 pm, 24 January 2024), <https://x.com/IsraeliPM/status/1750173383575077228>, published in Hebrew at Israel’s Prime Minister Office, @IsraeliPM_heb, Tweet (12:25 pm, 24 January 2024), https://x.com/IsraeliPM_heb/status/1750117712318042270: “There is no real parliament in Gaza. That is why we’ve seen the victory image of our forces toppling down the “parliament” of hatred and fanaticism. It is a powerful, very symbolic image, in a long and difficult military campaign.”

and the sons of darkness”, described the Israeli war goal as being “total victory”, and called for “ensuring that Gaza never again constitutes a threat to Israel”:

“This is not ‘another round’, neither is it an exchange of blows, nor is it an operation — it is total victory. Nothing less. I am committed to it. Our fighters are committed to it and the overwhelming majority of the people is committed to it. We will not compromise on anything less than total victory. I hear talk about all kinds of deals. I would like to make it clear: We will not conclude this war without achieving all of its goals. This means eliminating Hamas, returning all of our hostages and ensuring that Gaza never again constitutes a threat to Israel. We will not withdraw the IDF from the Gaza Strip and we will not release thousands of terrorists. None of this will happen. What will happen? Total victory. This victory, as it is written, will be achieved ‘Not by might and not by power but by My spirit said the LORD of Hosts.’ [Zechariah 4:6]. By spirit; it will be achieved by spirit.”⁴²

- On 31 January 2024, he expressly linked Israel’s unsubstantiated allegations regarding UNRWA employees alleged involvement in the 7 October 2023 attacks on Israel, to the ICJ’s reliance on UNRWA’s evidence in South Africa’s proceedings against Israel, stating “many of the charges, false and unfounded, that were leveled against us in The Hague were brought by UNRWA officials. And we have discovered in the last few weeks that UNRWA officials were complicit in the massacre.”⁴³ That same day, he told a delegation of United Nations Ambassadors in Jerusalem: “I think it’s time that the international community and the UN itself understand that UNRWA’s mission has to end. UNRWA is self-perpetuating. It is self-perpetuating also in its desire to keep alive the Palestinian refugee issue. And we need to get other UN agencies and other aid agencies replacing UNRWA if we’re going to solve the problem of Gaza as we intend to do.”⁴⁴
- On 17 February 2024, addressing the Israeli War Cabinet on Israel’s planned operation against Rafah, he stated: “[w]hoever wants to prevent us from operating in Rafah is telling us in effect to lose the war. I will not allow this . . . We will not surrender to any pressure. We will not surrender, because we are a people of heroes. We will not surrender, because we are a people that desires life. We will not surrender because we must, must, defeat the evil.”⁴⁵
- On 18 March 2024, he described Israel’s military operations in Gaza as a “a war of civilization against barbarism, those who want to bring back the Middle East to

⁴² Israel Prime Minister’s Office, *PM Netanyahu to the Students of the Bnei David Institutions in Eli: “The testament of the fallen is our mission – total victory”* (30 January 2024), <https://www.gov.il/en/departments/news/event-visit300124>, published in Hebrew to the same effect at Israel’s Prime Minister Office, @IsraeliPM_heb, Tweet (7:45 pm, 30 January 2024), https://x.com/IsraeliPM_heb/status/1752387489862467842.

⁴³ Prime Minister of Israel, @IsraeliPM, Tweet (9:43 pm, 31 January 2024), <https://twitter.com/IsraeliPM/status/1752779770432040969>.

⁴⁴ Israel Prime Minister’s Office, *Prime Minister Benjamin Netanyahu to a Delegation of UN Ambassadors: “It’s time that the international community and the UN itself understand that UNRWA’s mission has to end.”* (31 January 2024), <https://www.gov.il/en/departments/news/event-un310124>.

⁴⁵ Israel Prime Minister’s Office, *Statement by PM Netanyahu* (17 February 2024), <https://www.gov.il/en/departments/news/spoke-press170224>. See also Israel’s Prime Minister Office, @IsraeliPM_heb, Tweet (8:52 pm, 17 February 2024), https://x.com/IsraeliPM_heb/status/1758927459267891452: “We will not give in to any pressure. We will not surrender, as we are a nation of heroes. We will not surrender, as we are a nation that wishes to live. We will not surrender, as we must, must eradicate this evil. And so, we will not submit to international dictates regarding a future agreement with the Palestinians.”

the early Middle Ages, and those who want to see it march towards the 21st century”,⁴⁶ later reiterating that “[t]here is no force in the world that will stop us”.⁴⁷

- On 9 and 30 April 2024, he further described Israel’s war aims as being not only to “destroy Hamas’ military and governing capabilities”, or a release of all the hostages, but also to “ensure that Gaza will never again constitute a threat to Israel”.⁴⁸
- On 20 May 2024, following the Prosecutor of the International Criminal Court’s announcement of his application for arrest warrants for the Israeli Prime Minister and Minister of Defence, Benjamin Netanyahu stated: “I repeat what I said on the eve of Holocaust Memorial Day in Jerusalem. As the prime minister of Israel I pledge that no pressure, no decision, in any international forum, will prevent us from striking at those who wish to annihilate us. We will topple Hamas’s regime of evil and we will achieve total victory.” In the Hebrew version of the statement, he added “in the face of the lies in the Hague, I say: the glory of Israel does not deceive.”⁴⁹
- On 30 May 2024, in an interview on French Television, the Prime Minister further argued there is a surplus of calories for Palestinians in Gaza,⁵⁰ and characterised the call for “victory” of Israel’s military offensive in Gaza as a victory of “Judeo-Christian civilisation” over “barbarism”.⁵¹
- On 1 June 2024, the Prime Minister stated on X that “Israel’s conditions for ending the war have not changed: The destruction of Hamas military and governing capabilities, the freeing of all hostages and ensuring that Gaza no longer poses a threat to Israel”⁵² and that “[u]nder the proposal, Israel will continue to insist these conditions are met before a permanent ceasefire is put in place. The notion that Israel will agree to a permanent ceasefire before these conditions are fulfilled is a non-starter.”⁵³
- On 7 June 2024, the Prime Minister further indicated his disregard for any legal constraints on Israel’s genocidal acts vis-à-vis Palestinians, specifically its acts against Palestinian children. Responding to the United Nations Secretary General’s listing of Israel’s armed and security forces as committing “grave violations affecting children in situations of armed conflict” through killing and maiming

⁴⁶ Prime Minister of Israel, @IsraeliPM, Tweet (4:38 pm, 18 March 2024), <https://twitter.com/IsraeliPM/status/1769735099140985033>, published in Hebrew at Israel’s Prime Minister Office, @IsraeliPM_heb, Tweet (3:36 pm, 18 March 2024), https://x.com/IsraeliPM_heb/status/1769719484519010403: “Because this is a war of civilization against barbarism, between those who want to return the Middle East to the early Middle Ages and those who want to see it march towards the 21st century, which will be a century of progress and advancements. This is the essence of the war. It is a very big war.”

⁴⁷ Benjamin Netanyahu, @netanyahu, Tweet (7:17 pm, 9 April 2024), <https://x.com/netanyahu/status/177747582128689228>: “We will complete the destruction of Hamas units, including in Rafah. There is no force in the world that will stop us. There are many forces that are trying to stop us, but it won’t work. Because this enemy, after what they did, will not do it again. And it will not exist anymore.”

⁴⁸ Israel Prime Minister’s Office, PM Netanyahu at the IDF Induction Base at Tel Hashomer, met with IDF recruits slated to be fighters at crossings and field observers in the various sectors (9 April 2024), <https://www.gov.il/en/departments/news/event-idf090424>. Published in Hebrew to the same effect, at Israel’s Prime Minister Office, @IsraeliPM_heb, Tweet (2:21 pm, 9 April 2024), https://x.com/IsraeliPM_heb/status/1777673204720394352. See also Benjamin Netanyahu, @netanyahu, Tweet (7:37 pm, 30 April 2024), <https://twitter.com/netanyahu/status/1785362914519519597>, published in Hebrew to the same effect, at Israel’s Prime Minister Office, @IsraeliPM_heb, Tweet (4:40 pm, 30 April 2024), https://x.com/IsraeliPM_heb/status/1785318407128109478.

⁴⁹ Benjamin Netanyahu, @netanyahu, Tweet (8:28 pm, 20 May 2024), <https://x.com/netanyahu/status/1792623424893784221> [2:37]. Hebrew version available at Daniel Adelson, “Netanyahu attacking The Hague and calling on Congress: ‘Sanctions are the least that can be done’”, *Ynet* (23 May 2024), <https://www.ynet.co.il/news/article/bkwie113ma>.

⁵⁰ “Watch my interview with the French TV network TF1”, *Benjamin Netanyahu* (30 May 2024), <https://www.youtube.com/watch?v=tkV-RI6GXp8> [1:00 – 1:44].

⁵¹ *Ibid.* [10:35].

⁵² Prime Minister of Israel, @IsraeliPM, Tweet (9:52 am, 1 June 2024), <https://x.com/IsraeliPM/status/1796811942218043488>.

⁵³ Prime Minister of Israel, @IsraeliPM, Tweet (9:52 am, 1 June 2024), <https://x.com/IsraeliPM/status/1796811943753163139>.

children and attacking schools and hospitals,⁵⁴ he said “[t]he UN inscribed itself into history’s blacklist today when it joined the supporters of Hamas murderers.”⁵⁵

- On 1 July 2024, the Prime Minister on Israeli Army Radio labelled the release of the director of Al Shifa hospital — following months of alleged detainment, torture and ill-treatment⁵⁶ — “a serious fault and a moral failure, the decision was made without the knowledge of the political echelon”.⁵⁷

11. In October 2024, the Prime Minister’s Likud Party issued an invitation to an event titled ‘Preparing to Settle Gaza’, stating — “The Likud[...] Prepares for settlement in Gaza along with settlement groups”. The event was characterised by the co-organisier Nachala organisation,⁵⁸ as “not just a theoretical conference, but a practical exercise and preparation for renewed settlement in Gaza”.⁵⁹

Israeli Minister of Defence, Israel Katz Member of the Israeli Security Cabinet and Member of the War Forum

12. Minister of Defence Israel Katz (since 8 November 2024) was previously Israel’s Foreign Minister (1 January 2024 – 8 November 2024) and Israel’s Minister for Energy and Infrastructure (29 December 2022 – 1 January 2024). He is a Likud MK, and is a member of the Israeli Security Cabinet. He is also a member of the Prime Minister’s War Forum. Multiple statements he has made since 7 October 2023 — including on X where he has over 124 thousand followers and posts with up to 8.2 million views each⁶⁰ — evidence dehumanisation of Palestinians, the clear intent to protect Israel’s impunity, genocidal intent towards Palestinians in Gaza, and incitement to genocide. They include the following:

- On 7 October 2023, as then-Minister of Energy and Infrastructure, he stated on ‘X’ that he had “signed an order instructing the Israel Electric Corporation to stop supplying electricity to the Gaza Strip. What once was will be no more”.⁶¹ On 8 October 2023 an official statement published on the website of the Ministry of Foreign Affairs regarding operational decisions taken by the Security Cabinet, stated: “Among the decisions made by the Security Cabinet is halting the supply of electricity, fuel and goods.”⁶²
- On 9 October 2023, he ‘tweeted’ that “I instructed to immediately disconnect the water supply from Israel to Gaza. Electricity and fuel were disconnected the day before yesterday. What once was will be no more.”⁶³

⁵⁴ United Nations General Assembly (‘UNGA’), United Nations Security Council (‘UNSC’), *Children and Armed Conflict: Report of the Secretary-General*, A/78/842-S/2024/384 (3 June 2024), <https://www.undocs.org/S/2024/384>, pp. 3 and 46.

⁵⁵ Prime Minister of Israel, Benjamin Netanyahu, @netanyahu, Tweet (5:30 pm, 7 June 2024), <https://x.com/netanyahu/status/1799101734876500036>. See also in English, Benjamin Netanyahu, @netanyahu, Tweet (6:27 pm, 7 June 2024), <https://x.com/netanyahu/status/1799115940271169962>: “The UN put itself today on history’s black list when it adopted the absurd claims of Hamas. The IDF is the most moral military in the world and no ‘flat earth’ decision by the UN secretary general can change that.”

⁵⁶ UN Human Rights Palestine, @OHCHR_Palestine, Tweet (1:33 pm, 4 July 2024), https://x.com/OHCHR_Palestine/status/1808826449417158658; Jason Burke, “Freed Gaza hospital head accuses Israel of repeated torture”, *The Guardian* (1 July 2024), <https://www.theguardian.com/world/article/2024/jul/01/freed-gaza-hospital-head-accuses-israel-of-repeated-torture>.

⁵⁷ Israeli Army Radio, @GLZRadio, Tweet (6:17 pm, 1 July 2024), <https://x.com/GLZRadio/status/1807810881662734799>.

⁵⁸ On their activities see e.g. Jeremy Sharon, “Far-right activists break into Gaza, try to reestablish Israeli settlement”, *The Times of Israel* (29 February 2024), <https://www.timesofisrael.com/far-right-activists-break-into-gaza-try-to-reestablish-israeli-settlement/>.

⁵⁹ Noa Shpigel, “Netanyahu’s Likud Party Issues Invitation to Event Titled ‘Preparing to Settle Gaza’”, *Haaretz* (16 October 2024), <https://www.haaretz.com/israel-news/2024-10-16/ty-article/.premium/netanyahus-likud-party-issues-invitation-to-event-titled-preparing-to-settle-gaza/00000192-95b6-d9c2-a7f3-9db676f40000>.

⁶⁰ See, e.g., Israel Katz, @Israel_katz, Tweet (8:47 am, 24 May 2024), https://x.com/Israel_katz/status/1793896694729286117.

⁶¹ Israel Katz, @Israel_katz, Tweet (6:34 pm, 7 October 2023), https://x.com/Israel_katz/status/1710695021769265450.

⁶² Ministry of Foreign Affairs, *Security Cabinet convenes and makes series of operational decisions* (8 October 2023), <https://www.gov.il/en/pages/security-cabinet-convenes-and-makes-series-of-operational-decisions-8-oct-2023>.

⁶³ Israel Katz, @Israel_katz, Tweet (12:48 pm, 9 October 2023), https://x.com/Israel_katz/status/1711332854070640935.

- On 10 October 2023, he further declared on X: “Up until now we have transferred to Gaza 54,000 cubic meters of water and 2,700 megawatts of electricity per day. This is over. Without fuel, the local electricity will also shut down within days and the pumping wells will stop [being active] within a week. This is what will be done to a nation of murderers and children slaughterers. What once was will be no more.”⁶⁴
- On 11 October 2023, as then-Minister of Energy and Infrastructure, he explained on X: “[T]hat’s why we decided to stop the flow of water, electricity and fuel and now their local power station has collapsed and there is no electricity in Gaza. We will continue to tighten the siege until the Hamas threat to Israel and the world is removed. What once was will be no more.”⁶⁵
- On 12 October 2023, he ‘tweeted’: “Humanitarian aid to Gaza? No electrical switch will be lifted, no water hydrant will be opened and no fuel truck will enter until the Israeli hostages are returned home. Humanitarian [aid] for humanitarian [aid]. And let no one preach to us [about] morality.”⁶⁶
- On 13 October 2023, he stated — after Israel ordered 1.1 million Palestinians, including patients and staff in hospitals, to leave northern Gaza in the space of 24 hours:⁶⁷ “. . . All the civilian population in [G]aza is ordered to leave immediately. We will win. They will not receive a drop of water or a single battery until they leave the world.”⁶⁸ Less than three hours after the evacuation orders were communicated to Palestinians in northern Gaza,⁶⁹ he ‘tweeted’:

“The UN opposes the IDF’s evacuation notice for residents of northern Gaza to evacuate to the south of the Strip for [military] operational reasons and warns of devastating humanitarian consequences. What hypocrisy! We will not provide an ounce of water and electricity to those who do not evacuate. We will work in full force to eliminate the Hamas-ISIS murderers and restore security. What once was will be no more.”⁷⁰
- On 15 October 2023, he ‘tweeted’: “The decision to open the water to the south of the Gaza Strip, which was agreed upon between Prime Minister Netanyahu and President Biden, will result in pushing the civilian population to the south of the [Gaza] Strip and will make it possible to tighten the total siege on Gaza in terms of electricity, water and fuel, and will make it easier for the IDF to operate and destroy the Nazi Hamas infrastructure.”⁷¹ On the same day, he posted another tweet, with a GIF of Gaza plunged into darkness and the

⁶⁴ Israel Katz, @Israel_katz, Tweet (10:26 am, 10 October 2023), https://x.com/Israel_katz/status/1711659347590156417.

⁶⁵ Israel Katz, @Israel_katz, Tweet (2:29 pm, 11 October 2023), https://twitter.com/Israel_katz/status/171208312227909116.

⁶⁶ Israel Katz, @Israel_katz, Tweet (8:34 am, 12 October 2023), https://twitter.com/Israel_katz/status/1712356130377113904. Also available at Nicola Slawson, “First Thing: no power, water or fuel for Gaza until hostages are freed, Israel says”, *The Guardian* (12 October 2023), <https://www.theguardian.com/us-news/2023/oct/12/first-thing-no-power-water-fuel-gaza-until-hostages-freed-israel-says>.

⁶⁷ International Committee of the Red Cross (‘ICRC’), *Israel and the occupied territories: Evacuation order of Gaza triggers catastrophic humanitarian consequences* (13 October 2023), <https://www.icrc.org/en/document/israel-and-occupied-territories-evacuation-order-of-gaza-triggers-catastrophic-humanitarian-consequences>; World Health Organisation (‘WHO’), *WHO pleads for immediate reversal of Gaza evacuation order to protect health and reduce suffering* (13 October 2023), <https://www.who.int/news/item/13-10-2023-who-pleads-for-immediate-reversal-of-gaza-evacuation-order-to-protect-health-and-reduce-suffering>; United Nations Office of the United Nations High Commissioner for Human Rights (‘UN OHCHR’), *Israel must rescind evacuation order for northern Gaza and comply with international law: UN expert* (13 October 2023), <https://www.ohchr.org/en/press-releases/2023/10/israel-must-rescind-evacuation-order-northern-gaza-and-comply-international>.

⁶⁸ Israel Katz, @Israel_katz, Tweet (7:01 pm, 13 October 2023), https://twitter.com/Israel_katz/status/1712876230762967222; translation at *South Africa v. Israel, Provisional Measures, Order of 26 January 2024*, p. 18, para. 52.

⁶⁹ Avichay Adraee, @AvichayAdraee, Tweet (6:16 am, 13 October 2023), <https://x.com/AvichayAdraee/status/1712683686213144638>.

⁷⁰ Israel Katz, @Israel_katz, Tweet (8:30 am, 13 October 2023), https://x.com/Israel_katz/status/1712717454047113692.

⁷¹ Israel Katz, @Israel_katz, Tweet (5:08 pm, 15 October 2023), https://x.com/Israel_katz/status/1713572621994828188.

accompanying text: “Cutting off electricity in Gaza. The disaster Hamas inflicted on the citizens of Gaza. Watch.”⁷²

- On 22 October 2023, as then-Minister of Energy and Infrastructure, he explained in an interview on Mako that “[t]he Air Force is operating [in Gaza] like it never has operated before, it has taken the gloves off . . . I passed a decision in the Cabinet that serves as a precedent: humanitarian [aid] for humanitarian [aid]. And in that moment we disconnected completely . . . I signed off in that moment on disconnecting all electricity from Israel [to Gaza]. . . Listen. I arranged to cut the water supply, fuel was blocked and didn’t get into Gaza, because that is how I thought it should have been in the past, and certainly now. We must defeat Hamas, create a different reality there, destroy anything related to it militarily and [in terms of] government mechanisms. At the end, Israel will not supply Gaza with even a single grain” and that “[i]t was only because of a request from the President of the United States that ultimately, it was decided to give them humanitarian aid in the south of the Gaza Strip, to those who evacuated from the northern Gaza Strip.”⁷³
- On 20 October 2023, Channel 14 posted various excerpts of interviews with Minister Katz, in which he stated:

“ . . . there was a request and a demand from the president of the United States, in exchange for all the aid he provides – and truly, the aid, the aid is in the form of backup, of tremendous forces, almost unprecedented, that have arrived to the region here: aircraft carriers, warships, other things, armament, assistance in all aspects – and he says: I want and need the humanitarian issue. I think that the Prime Minister, who is navigating this issue, brought it to a place where [the agreement was], okay, so it [the humanitarian aid] will be in the southern Gaza Strip. There, in any case, we’ve pushed close to a million people from the north of the [Gaza] Strip to move there, and there we can address the humanitarian issue to meet that demand. But again, I’m saying: morally, because of the hostages, this is not a normal situation. Because of the hostages, in my view, neither water nor electricity nor anything else should have been allowed in. Now, Israel is not providing – and I can tell you that the same water that they opened the valves there to the southern region, there was a technical problem and water is not being supplied tonight. But in any case . . .

Panellist: Bless is He who creates technical problems. Katz: [Smiling] Yes. It must be the influence of an invisible hand. [...] But in any case, the pressure on Gaza, where the norm was to provide 1,500 trucks per day, we have to understand that what we are talking about now is really [just] a drop in the ocean. Gaza is generally under siege, [and] not just from the Israeli direction. There is no supply of stuff there. And we must use this in order to weaken them, and also to apply pressure. . . Let me tell you: no one here would like to be in Gaza now. Because the amount –

Interviewer: Not just now.

Katz: “No one would like to be in Gaza. Yes. . . The amount of bombs the Air Force is dropping there, in a coordinated and precise fashion. The artillery fire. . . [We] are taking care of, with maximum force, everything that’s going on there. . . I don’t remember [in a long time] the IDF operating in such force. A crushing force. And still we are getting support from the United States, from most European countries, from the European

⁷² Israel Katz, @Israel_katz, Tweet (1:54 pm, 15 October 2023), https://x.com/Israel_katz/status/1713523677793247709.

⁷³ “We Are in a Third World War Against the Radical Islam”, *Mako* (22 October 2023), <https://www.mako.co.il/tv-morning-news/articles/Article-de1d4c638165b81027.htm> [4:00 onward].

Union which isn't calling for a ceasefire, and which gives the IDF the backing to operate and achieve its aims.”⁷⁴

- On 22 October 2023, on the talk show ‘the Patriots’ on Channel 14, he admitted that: “The aerial blows they are suffering today are unprecedented, because the policy has changed as well. Today, in order to shoot and take out, even a person who is inside a building, there’s no ‘roof knocking’ [nickname for IDF practice of dropping devices on targeted civilian homes as warning], and there’s no view of collateral [damage] . . . When the president of the US comes and says: I’m going to give you everything you want, I just want one thing, humanitarian [aid]. So they managed to limit it to the southern region of Gaza . . . so they managed to limit it to the southern region of Gaza. . . . When I tweeted [about shutting off the water supply to Gaza] I was leading both the [policy’s] execution — the execution I [unintelligible] who closes the [water] valves — as well as the public campaign around the issue . . . We] will have to take buffer zones. Personally I’m in favour of taking the northern border area, where Dugit, Nisanit, and Elei Sinai used to be, and the fence was behind them. . . .”⁷⁵
- On 8 January 2024, Channel 14 posted an excerpt online of the talk show ‘the Patriots’ with Minister Katz as talk show guest, who further admitted that: “. . . [a]t the outset of the campaign, morally and practically, the only way to apply pressure, before the ground manoeuvre, was a total blockade — and the [international] courts can quote me, I’m proud of this — a total blockade on Gaza! We blocked everything. Everything! What was [coming in] through us, and what was [coming in] through Egypt. Later, the US president requested, so we moved it to the south, it also helped moving one million people down into things [sic]. . . .”⁷⁶
- On 27 January 2024, as then-Minister for Foreign Affairs, he ‘tweeted’: “We have been warning for years: UNRWA perpetuates the refugee issue, obstructs peace, and serves as a civilian arm of Hamas in Gaza.”⁷⁷
- On 4 February 2024, as then-Israeli Minister of Foreign Affairs he ‘tweeted’ that “UNRWA is part of the problem. It’s part of Hamas’s terrorist infrastructure in Gaza. It’s part of the Palestinian lie that there are ‘refugees’ who need to return to the State of Israel. We are working to remove UNRWA from Gaza. They are the problem — not the solution.”⁷⁸
- On 7 March 2024, as then-Minister of Foreign Affairs, he ‘tweeted’ in response to an official United Nations statement that “more than half the requests . . . to bring food, clean water and medical aid to the north [of Gaza] have been rejected by Israeli authorities” and that “90% of [the] population has high levels of food insecurity”, that: “UNRWA rejected 100% of our requests not to hire terrorists as employees”.⁷⁹ Later that day, he shared a video on X that asserted: “It’s time for action . . . UNRWA is part of the problem. It cannot be part of the solution”, with an accompanying tweet stating “Revealed: UNRWA’s deep ties to

⁷⁴ “Minister Katz: ‘Palestinians Will Not Enter the State of Israel to Work For At Least Six Months’”, *Now 14 News*, @now14 (30 October 2023), <https://www.youtube.com/watch?v=RI4uhe-daMI>.

⁷⁵ Efrat Karo, “Minister Katz: ‘We are Going All-Out — Destroy Hamas’”, *Now 14* (22 October 2023), <https://www.now14.co.il/article/862020>.

⁷⁶ “Minister Katz Takes Responsibility for the Assassination of the Redwan Force Official: ‘The Americans Will Not Fight In Our Stead’”, *Now 14*, @now14 (8 January 2024), <https://www.youtube.com/watch?v=AoohoI5u8yw> [19:36 onward].

⁷⁷ Israel Katz, @Israel_katz, Tweet (10:01 am, 27 January 2024), https://x.com/Israel_katz/status/1751153470617379008.

⁷⁸ Israel Katz, @Israel_Katz, Tweet (6:05 pm, 4 February 2024), https://twitter.com/Israel_katz/status/1754174311768695267. Statement in English to a similar effect at Israel Katz, @Israel_katz, Tweet (6:15 pm, 4 February 2024), https://twitter.com/Israel_katz/status/1754176771967029757.

⁷⁹ Israel Katz, @Israel_katz, Tweet (7:35 am, 7 March 2024), https://twitter.com/Israel_katz/status/1765612272368394678.

terrorism. It's time to close UNRWA and introduce transparent, accountable aid organizations for Palestinians".⁸⁰

- On 23 March 2024, after the United States Congress passed a one-year ban on funding for UNRWA (after unsubstantiated allegations by Israel that UNRWA staff were allegedly involved in the 7 October 2023 attacks⁸¹) Minister Katz expressly called on "more countries to follow the U.S. and ban funding to this organization [UNRWA]"⁸² — despite the ICJ's January Order, and in the face of clear warnings from all major United Nations agencies that "[d]ecisions by various Member States to pause funds from UNRWA will have catastrophic consequences for the people of Gaza".⁸³ Later that same day he 'tweeted' that "the UN has become an antisemitic and anti-Israeli body that shelters and emboldens terror".⁸⁴
- On 11 June 2024, the Ministry of Foreign Affairs (led by Katz), which manages Israel's official X account, posted — in a video shared with its 1.8 million followers and also promoted throughout X as an advertisement — a now-deleted quote stating "There are no innocent civilians there [in Gaza]."⁸⁵ That same day, his Ministry of Foreign Affairs also 'tweeted' another post on its channel, stating "[w]e have to start to really talk honestly about the definition of civilian casualties."⁸⁶
- On 8 August 2024, the Minister posted on X: "[t]oday, I ordered the revocation of diplomatic status for 8 Norwegian diplomats in Israel who were dealing with Palestinian Authority affairs. Instead of fighting Palestinian terrorism after October 7th and supporting Israel in its war against the Iranian axis of evil, Norway chose to reward Hamas murderers and rapists by recognizing a Palestinian state. But they didn't stop there — they also joined the baseless lawsuit against us in the ICC, seeking arrest warrants for the Prime Minister and the Defense Minister. Norway has pursued a one-sided policy on the Palestinian issue and will therefore be excluded from any involvement in it. Those who attack us and pursue a one-sided policy against us will pay a price."⁸⁷
- On 17 December 2024, the Minister further clarified his intent for Israel to stay in Gaza and repeat its actions in the West Bank there, 'tweeting': "my position regarding Gaza is clear. After we subdue Hamas's military and governmental power in Gaza, Israel will have military control over Gaza with full freedom of action, just like in Judea and Samaria. . . ."⁸⁸

⁸⁰ Israel Katz, @Israel_Katz, Tweet (3:25 pm, 7 March 2024), https://twitter.com/Israel_katz/status/1765730390054928663. See also e.g., Israel Katz, @Israel_Katz, Tweet (5:51 pm, 27 January 2024), https://x.com/Israel_katz/status/1751271598991040649; Israel Katz, @Israel_Katz, Tweet (6:15 pm, 4 February 2024), https://x.com/Israel_katz/status/1754176771967029757; and Israel Katz, @Israel_Katz, Tweet (8:18 am, 23 March 2024), https://x.com/Israel_katz/status/1771421285790228926.

⁸¹ Further Consolidated Appropriations Act, 2024 (United States of America), Division G, Title III, s 301 "Funding Limitation for United Nations Relief and Works Agency", <https://www.congress.gov/bill/118th-congress/house-bill/2882/text>. Independent Review Group on the UN Relief and Works Agency for Palestine Refugees in the Near East, *Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality: Final Report for the United Nations Secretary-General* (20 April 2024), https://www.un.org/sites/un2.un.org/files/2024/04/unrwa_independent_review_on_neutrality.pdf.

⁸² Israel Katz, @Israel_katz, Tweet (8:18 am, 23 March 2024), https://twitter.com/Israel_katz/status/1771421285790228926.

⁸³ Inter-Agency Standing Committee, *Statement by Principals of the Inter-Agency Standing Committee, We cannot abandon the people of Gaza* (30 January 2024), <https://interagencystandingcommittee.org/inter-agency-standing-committee/statement-principals-inter-agency-standing-committee-we-cannot-abandon-people-gaza>. See also UN News, *Humanitarian response in Gaza 'completely dependent' on UNRWA, says relief chief* (31 January 2024), <https://news.un.org/en/story/2024/01/1146067>; Martin Griffiths [previous], @UNReliefChief, Tweet (9:25 pm, 31 March 2024), <https://twitter.com/UNReliefChief/status/1774518283204489528>.

⁸⁴ Israel Katz, @Israel_katz, Tweet (3:50 pm, 23 March 2024), https://x.com/Israel_katz/status/1771534978364383484.

⁸⁵ Israel, @Israel, Tweet (8:40 am, 11 June 2024), <https://x.com/Israel/status/1800447973962424697>, tweet archived at <https://archive.ph/Eu3ON>, screenshot of relevant excerpt of video and advertisement at Prem Thakker, @prem_thakker, Tweet (4:15 pm, 12 June 2024), https://x.com/prem_thakker/status/1800894646073409621.

⁸⁶ Israel, @Israel, Tweet (8:13 am, 11 June 2024), <https://x.com/Israel/status/1800441176740536611>, tweet archived at <https://archive.ph/r0t74>.

⁸⁷ Israel Katz, @Israel_katz, Tweet (2:04 pm, 8 August 2024), https://x.com/Israel_katz/status/1821517816903676216.

⁸⁸ Israel Katz, @Israel_katz, Tweet (7:20 am, 17 December 2024), https://x.com/Israel_katz/status/1868904059673129074.

Israeli Minister of Strategic Affairs, Ron Dermer
Member of the Israeli Security Cabinet and Member of the War Forum

13. Israeli Minister of Strategic Affairs and Likud MK Ron Dermer is a member of the Security Cabinet and was an observer in the now-defunct War Cabinet. He is reportedly one of the Prime Minister's closest advisers.⁸⁹ On 26 March 2024 — after South Africa's request for additional Provisional Measures on account of widespread starvation,⁹⁰ the deaths from starvation and dehydration of dozens of Palestinians in Gaza,⁹¹ and after the Integrated Food Security Phase Classification ('IPC') and Famine Review Committee published their findings that 1.1 million Palestinians in Gaza were facing famine — he continued to deny the fact of hunger in Gaza, asserting that “there is *no* starvation”. He also dismissed the facts and warnings by experts as “a complete lie and fabrication” and “a libel against Israel”.⁹² This view appears to reflect the official Israeli position — as articulated by the spokesperson for the Israeli ‘National Public Diplomacy Directorate’ whose social media ‘handle’ ‘@Nationalhasbara’ is reportedly run by the Prime Minister's office — that “this myth that there is hunger in Gaza is exactly that, a myth”.⁹³

Israeli Minister of Finance, Bezalel Smotrich
Member of the Israeli Security Cabinet and Member of the War Forum

14. Minister of Finance, MK Bezalel Smotrich is a Member of the Security Cabinet and the leader of the Religious Zionism Party, which is in coalition with Benjamin Netanyahu's Likud Party. He is responsible for *inter alia* the Government's overall economic policy, and for preparing the draft budget, monitoring the implementation of the approved budget, and the collection of taxes (involving customs controls at ports of entry).⁹⁴ As of at least 4 April 2024, the Minister of Finance moreover may jointly formulate any operational instructions and implementing directives, where such instructions or directives would have a direct or indirect economic influence or consequence — pertaining to the policy of the Security Cabinet regarding the transfer of humanitarian aid to Gaza.⁹⁵ Since 12 January 2024, Israel's Minister of Finance also serves as Minister in the Ministry of Defense, with the Government's Coalition Agreements allowing him “to appoint the Generals leading COGAT”, as well as its office overseeing the Civil Administration (governing Palestinians civilian life in the

⁸⁹ See, e.g., Aaron Boxerman, “Who Is in Israel's War Cabinet?”, *The New York Times* (26 October 2023), <https://www.nytimes.com/2023/10/26/world/middleeast/israel-war-cabinet-hamas.html>; “Ron Dermer to be strategic affairs minister in Netanyahu gov't”, *The Jerusalem Post* (29 December 2022), <https://www.jpost.com/israel-news/article-726098>.

⁹⁰ *South Africa v. Israel, Request by South Africa for the indication of provisional measures and modification of the Court's prior provisional measures decisions of 6 March 2024*, <https://www.icj-cij.org/sites/default/files/case-related/192/192-20240306-wri-01-00-en.pdf>.

⁹¹ At least 31 Palestinians, including 27 children, had died of malnutrition and dehydration as of 25 March 2024, UN OCHA, *Hostilities in the Gaza Strip and Israel - reported impact | Day 169* (25 March 2024), <https://www.ochaopt.org/content/hostilities-gaza-strip-and-israel-reported-impact-day-169>.

⁹² Leila Fadel and Daniel Estrin, “Cease-fire resolution, growing support for Gaza in the U.S. sour relations with Israel”, NPR (26 March 2024), <https://www.npr.org/2024/03/26/1240884500/ceasefire-resolution-growing-support-for-gaza-in-the-u-s-sour-relations-with-isr>; Ron Dermer – דרמר רון, @AmbDermer, Tweet (6:57 pm, 26 March 2024), <https://twitter.com/AmbDermer/status/1772669238559264840>.

⁹³ “LIVE: The Daily Briefing – 21/03/2024”, יחד ננצח! – מערך ההסברה הלאומי (21 March 2024), <https://www.youtube.com/live/y-7G2MzKQxk>, [at 8:10].

⁹⁴ Israeli Government: Ministry of Finance, *About Ministry of Finance* (30 January 2019), https://www.gov.il/en/pages/about_mof.

⁹⁵ *Gisha et al. v. Government of Israel et al., Supreme Court of Israel*, Supplementary Notice on Behalf of the Respondents: Annex 1: Copy of the Cabinet Decision (4 April 2024), HCJ 2280/24, <https://static.gisha.org/uploads/2024/04/%D7%91%D7%92%D7%A5-2280-24-%D7%94%D7%95%D7%93%D7%A2%D7%94-%D7%92%D7%9C%D7%95%D7%99%D7%94-%D7%AA%D7%A6%D7%94%D7%99%D7%A8%D7%99%D7%9D-%D7%A0%D7%A1%D7%A4%D7%97%D7%99%D7%9D.pdf>, paras. 2, 7.

West Bank for competences not transferred to the State of Palestine).⁹⁶ Accordingly, the Minister of Finance, in tandem with the other members of the Security Cabinet, has immediate responsibility for Israel's conduct in Gaza. He lives in the illegal Israeli settlement of Kedumim in the occupied West Bank. Since 7 October 2023, he has made the following statements dehumanising Palestinians, and evidencing genocidal intent and inciting genocide against them, including to his 289,000 followers on X:

- On the evening of 7 October 2023, during a cabinet meeting of Ministers of the Israeli government, he stated: "We must be cruel now, not [be] too considerate of the captives", and saying "[i]f you want to shoot, shoot don't talk."⁹⁷
- On 9 October 2023, he posted on X that "There are many things we as a government and as an army need to do . . . The attacks on Gaza will keep intensifying in the coming hours and days and they will be on a whole other level. G-d willing, we will do [it] and we will succeed!"⁹⁸
- On 19 November 2023, he 'tweeted' his agreement "with every word"⁹⁹ of a newspaper column by Giora Eiland a retired Israeli Army Major General, former Head of the Israeli National Security Council, and sometime Adviser to the Israeli Minister of Defence, which stated that:

"The argument about Israel's response to the international demands to allow fuel into Gaza reflects a fundamental conflict between Israel and the US about the correct narrative. According to the American narrative, there are two groups of people in Gaza. The one is Hamas fighters, who are cruel terrorists and therefore deserve to die. The second group is the one most people in Gaza belong to, innocent citizens who are suffering because of no fault of their own, and so Israel must not only avoid harming them at all costs but must also actively try to make their lives easier. The other, truer narrative, is as follows: Israel is not fighting against a terrorist organization but against the state of Gaza . . . we say that Sinwar is so evil that he doesn't care if all residents of Gaza die. This is inaccurate, for who are these "miserable" Gazan women? They are all the mothers, sisters or wives of Hamas murderers. On one hand they are part of the infrastructure supporting the organization, and on the other hand if they experience a humanitarian disaster, then we can assume that some of the Hamas warriors and junior commanders will begin to realize that the war is pointless and that it's better to prevent permanent harm to their family members. The way to win the war faster and with less casualties on our side requires the failure of organizational structures on the other side, and not only the killing of more Hamas fighters. The international community warns us of a humanitarian disaster in Gaza and of severe plagues. We must not flinch in the face of this, as difficult as that may be. After all, severe plagues in the south of the [Gaza] Strip will hasten our victory and minimize IDF casualties".¹⁰⁰

⁹⁶ Emanuel Fabian, "'Civil responsibility' in West Bank handed to Smotrich after meeting with COGAT head", *The Times of Israel* (12 January 2023), <https://www.timesofisrael.com/incoming-idf-chief-halevi-to-meet-with-smotrich-who-wields-authority-in-west-bank/>. See also Peace Now, *On the Transfer of Responsibilities and Powers over the West Bank Civil Administration to Bezalel Smotrich* (5 December 2022) <https://peacenow.org.il/en/on-the-transfer-of-responsibilities-and-powers-over-the-west-bank-civil-administration-to-bezalel-smotrich>; Eliav Liebllich, "*Smotrich is about to become the West Bank's overlord. Here's what's at stake*", *+972 Magazine* (7 December 2022), <https://www.972mag.com/smotrich-west-bank-civil-administration/>; Israeli Government: Ministry of Finance, *Bezalel Smotrich: Minister of Finance* (13 July 2023), <https://www.gov.il/en/pages/minister>.

⁹⁷ "Confrontations At The Cabinet Meeting: 'We Need To Be Brutal'", *Kan News* (7 October 2023), <https://www.kan.org.il/content/kan-news/politic/559622/>.

⁹⁸ Bezalel Smotrich, @bezalelsm, Tweet (9:27 pm, 9 October 2023), <https://x.com/bezalelsm/status/1711463378902741323>.

⁹⁹ Bezalel Smotrich, @bezalelsm, Tweet (1:20 pm, 19 November 2023), <https://twitter.com/bezalelsm/status/1726198721946480911>.

¹⁰⁰ Giora Eiland, "Let's not be intimidated by the world", *Yedioth Ahronoth* (print) (19 November 2023), in Bezalel Smotrich, @bezalelsm, Tweet (1:20 pm, 19 November 2023), <https://twitter.com/bezalelsm/status/1726198721946480911>.

- On 28 November 2023, he posted on X: “[a] reminder to those who have not yet sobered up and think that the Nazis in Judea and Samaria are different from the Nazis in Gaza. We will strengthen the settlement and cripple the Nazis wherever they are to ensure ‘never again!’.”¹⁰¹
- On 31 December 2023, he asserted in a radio interview on Israeli Army Radio that “there will be migration [from] there and we will live in the Gaza Strip”, and that Israel “won’t allow a situation of two million people living there. If there will be 100-200 thousand Arabs living in Gaza, the entire discourse about the day after will be different. They want to leave, they’ve been living in a ghetto and in hardship for 75 years”.¹⁰²
- On 7 January 2024, he stated to Israeli media: “I will talk about the day after in Gaza Strip, the need to fix the past’s mistakes, and we must have long-term control there, and we cannot control it without new settlement there. And by the way contrary to the lies — and here we should say a word about the Americans — I hear even now, I think it was the Secretary of State, who denies remarks of — remarks made by senior officials in the Israeli government about forced expulsion. No one talked about forced expulsion. Nobody in the Israeli government ever said forced expulsion . . . Nazis reside in Gaza, 2 million Nazis, who are kept there as hostages: impoverished, crowded, with nothing, five or six generations now. [Interviewer: You have to decide, either they’re victims or Nazis.] No, they’re being kept there by the Arab world, intentionally. I’ve been saying for years that Gaza is a ticking time bomb with a destruction mechanism [unintelligible] to the State of Israel. 75% of Gaza’s population are refugees. . . But let me tell you, a large part of Gaza’s population, if you only let them it, would like to leave. Most of them would like to get out of there. There’s nothing for them there. Look at all the polls that [unintelligible] has been doing for years. What, like this is news for you? They’re being held there like in a prison. . . Israel must control Gaza long-term. It won’t control Gaza without civilian presence [there], period. . . Gush Katif was truly a fool’s errand, because it was, you know, a few small villages trapped in a large space . . . We need to establish Jewish settlement throughout the Gaza Strip’s territory so there will be a long-term Jewish presence there, so terrorism doesn’t develop there, because if we won’t be there, and there will be there two million Nazis who want to destroy us as they wake up every morning, we won’t exist, period.”¹⁰³ The Minister had already in 2017 set out his vision in a published ‘plan for the future of Israel’ which provides that “there is room for only one expression of national self-determination west of the Jordan River: that of the Jewish nation”.¹⁰⁴
- On 26 January 2024, the day the International Court of Justice issued its January Order, he ‘tweeted’ that: “[t]he Hague judges who are worried about the Gazans are welcome to call upon the nations of the world to open their gates and assist in the settlement and rehabilitation of Gaza’s residents.”¹⁰⁵
- On 28 January 2024 — two days after the International Court of Justice’s January Order — he spoke at the ‘Victory of Israel: Settlement Brings Security’

¹⁰¹ Bezalel Smotrich, @bezalelsm, Tweet (9:51 am, 28 November 2023), <https://twitter.com/bezalelsm/status/1729407722766897329>. Also available at Middle East Eye, “Israel-Palestine war: Occupied West Bank home to ‘two million Nazis’ says Smotrich”, *Middle East Eye* (29 November 2023), <https://www.middleeasteye.net/news/israel-palestine-war-occupied-west-bank-two-million-nazis-smotrich>.

¹⁰² Interview with Bezalel Smotrich on Army Radio, 31 December 2023: Israeli Army Radio GLZ, @GLZRadio, Tweet (8:36 am, 31 December 2023), <https://twitter.com/GLZRadio/status/1741347524693127398>.

¹⁰³ “Smotrich clarifies: ‘We need to establish Jewish settlement in the Gaza Strip.’”, *Now14* (07 January 2024), <https://www.youtube.com/watch?v=VNC7xGFfdQ0> [2:33 onward].

¹⁰⁴ Bezalel Smotrich, “Israel’s Decisive Plan”, *Hashiloach* (2017), <https://hashiloach.org.il/israels-decisive-plan/>.

¹⁰⁵ Bezalel Smotrich, @bezalelsm, Tweet (4:14 pm, 26 January 2024), <https://x.com/bezalelsm/status/1750884993528692949>.

conference and called for the Israeli resettlement of Gaza, saying, *inter alia*: “God willing, we will settle and we will be victorious”.¹⁰⁶ Both he and the Minister of National Security, Itamar Ben-Gvir — two of nine Ministers and 15 MKs to attend the conference¹⁰⁷ — signed the “Covenant of Victory and Renewal of Settlement”, pledging to “grow Jewish settlements full of life” in Gaza.¹⁰⁸ Displayed at the conference was, *inter alia*,¹⁰⁹ one of the videos relied upon and played by South Africa in its presentation before the International Court of Justice on 11 January 2024, recording soldiers in the Israeli military chanting “I stick by one mitzvah (religious obligation), to wipe out the seed of Amalek . . . our slogan is known, there are no uninvolved”;¹¹⁰ as well as a picture of soldiers holding plaques stating “We the soldiers of The Jewish People’s army right-wing and left-wing will not take off our uniform until we erase and annihilate Gaza”¹¹¹ and a soldier stating: “To say, in a place they built in order to destroy, we’re destroying in order to build. In a place where they wanted to extinguish life, we came to add life. Everything we’re doing here will be used for the settlements we will build here, God willing.”.¹¹²

- On 1 February 2024, the Minister appeared on Israeli media saying: “Contrary to the whining and moaning [you hear] on the news panels — we are tearing them apart . . . It is impossible to live in three quarters of the Gaza Strip today.”¹¹³
- On 6 February 2024, he ‘tweeted’ his support for “the position of Ministers Gantz and Sa’ar in favour of stopping the humanitarian aid” which he described as “now go[ing] mostly . . . [to] Hamas.”¹¹⁴
- On 13 February 2024, he personally intervened to prevent the shipments of flour to the UNRWA from being transferred from Israel’s Ashdod port to Gaza:¹¹⁵ “I

¹⁰⁶ Jeremy Sharon, “Cabinet members call to resettle Gaza, encourage Gazans to leave, at jubilant conference”, *The Times of Israel* (29 January 2024), <https://www.timesofisrael.com/12-ministers-call-to-resettle-gaza-encourage-gazans-to-leave-at-jubilant-conference/>.

¹⁰⁷ The Ministers who attended were (Likud): Minister of Communications, Shlomo Karhi; Minister of Tourism, Haim Katz; Minister of Environmental Protection, Idit Silman; Minister of Social Equality and the Advancement of Women, May Golan; and Minister for Diaspora Affairs and Combating Antisemitism, Amichai Chikli. As well as (Otzma Yehudit) Minister of National Security, Itamar Ben Gvir; Minister for the development of the Periphery, the Negev and the Galilee, Yitzhak Wasserlauf; and Minister of Heritage, Amichai Eliyahu. Also in attendance were (Religious Zionism) Minister of Finance Bezalel Smotrich; as well as Minister of Settlements and National Missions Orit Strock, and (United Torah Judaism) Minister of Housing and Construction, Yitzhak Goldknopf. See “At Sderot settlement rally, Ben Gvir calls for ‘voluntary emigration’ of Gazans”, *Times of Israel* (14 May 2024), https://www.timesofisrael.com/liveblog_entry/at-sderot-settlement-rally-ben-gvir-calls-for-voluntary-emigration-of-gazans/.

¹⁰⁸ Jeremy Sharon, “Cabinet members call to resettle Gaza, encourage Gazans to leave, at jubilant conference”, *The Times of Israel* (29 January 2024), <https://www.timesofisrael.com/12-ministers-call-to-resettle-gaza-encourage-gazans-to-leave-at-jubilant-conference/>.

¹⁰⁹ See also Gilad Cohen and Moran Azoulai, “‘Encourage immigration’ and signing the ‘Treaty on the Renewal of Settlement in Gaza’: the conference with the senior coalition officials”, *Ynet* (28 January 2024), <https://www.ynet.co.il/news/article/bjxbwvqa>.

¹¹⁰ “Conference for the victory of Israel - settlement brings security. Building the Nation”, *STV-Live* (28 January 2024), <https://www.youtube.com/watch?v=SVKhg1M6LY4>, [1:13:03 - 1:13:20]; Oren Ziv, “Turning Zeitoun into Shivat Zion: Israeli summit envisions Gaza resettlement”, *+972 Magazine* (30 January 2024), <https://www.972mag.com/israeli-summit-gaza-resettlement-transfer/>, referring to Yinon Magal, @YinonMagal, Tweet (6:44 am, 7 December 2023), <https://twitter.com/YinonMagal/status/1732652279461757102>, quoted in *South Africa v. Israel, Application instituting proceedings and request for the indication of provisional measures of 29 December 2023*, <https://www.icj-cij.org/case/192/institution-proceedings>, p. 65, para. 103 and in *South Africa v. Israel, Verbatim Record 2024/1 (11 January 2024)*, p. 36, para. 21.

¹¹¹ Conference for the victory of Israel - settlement brings security. Building the Nation”, *STV-Live* (28 January 2024), <https://www.youtube.com/watch?v=SVKhg1M6LY4>, [1:14:29].

¹¹² Conference for the victory of Israel - settlement brings security. Building the Nation”, *STV-Live* (28 January 2024), <https://www.youtube.com/watch?v=SVKhg1M6LY4>, [1:12:13 - 1:12:32].

¹¹³ Uzi Baruch, “Minister Bezalel Smotrich reveals: There is a change in the provision of aid, we will not strengthen Hamas”, *Israel National News* (1 February 2024), <https://www.inn.co.il/news/628001>, [4:07].

¹¹⁴ Bezalel Smotrich, @bezaelsm, Tweet (7:35 pm, 6 February 2024), <https://twitter.com/bezaelsm/status/1754921677253742973>.

¹¹⁵ “Smotrich blocks flour shipments from reaching Gaza, in breach of Israeli pledge to US”, *The Times of Israel* (14 February 2024), <https://www.timesofisrael.com/finance-minister-blocks-flour-shipments-from-reaching-gaza/>.

have instructed not to let through the flour shipments intended for UNRWA in Gaza . . .”¹¹⁶

- On 13 April 2024, he ‘tweeted’: “we strengthen with actions our commitment to settle in every region of the Land of Israel,”¹¹⁷ emphasising an intent to control Palestinian territory. He also asserted his view that all Palestinians are “Nazis”, stating in relation to the killing of an Israeli child in the West Bank: “[w]e are dealing with Nazis. Nazis in Gaza and Nazis in Judea and Samaria [the West Bank]. The sooner we realise this, and adopt harsher policies against the enemy, the sooner we may restore deterrence against the vile enemy.”¹¹⁸
- On 14 April 2024, he returned to the theme of the resettlement of Gaza, calling on X for the reestablishment of “full Israeli control over the Gaza Strip”.¹¹⁹
- On 15 April 2024, speaking on Israeli Army Radio Galei Tzahal — a radio network of the Israeli army, he stated that: “[t]here are two million Nazis in Gaza who want to slaughter, rape and murder every Jew. If local population rules there it will be a terrorist organization. Whoever wants to maintain [Israel’s] security, right now we need to rule there operationally and militarily until we can develop local moderate forces to replace.”¹²⁰
- On 29 April 2024, at a religious celebration dinner, he quoted a verse of the Hebrew Bible referring to Amalek, calling for the annihilation of Rafah and other cities and refugee camps in Gaza, stating: “[t]here are no half measures, Rafah, Deir al-Balah, Nuseirat — total annihilation. ‘You shall blot out the memory of Amalek from under heaven’ — there’s no place under heaven.”¹²¹
- On 22 May 2024, subsequent to Ireland, Norway and Spain’s announcement of their impending recognition of the State of Palestine,¹²² he ‘tweeted’ that in retaliation, he “do[es] not intend to transfer the [tax] revenues to the PA anymore, from now until further notice, and as I informed you in my letter two weeks ago, I do not intend to extend the indemnification to the correspondent banks at the end of next month.”¹²³ Such a move would close a critical lifeline to the already struggling Palestinian economy.¹²⁴
- On 30 May 2024, he posted on X: “I am now finishing a short but very exhaustive tour with the heads of municipalities and settlement leadership here along the Seam Zone. I want to state two things. One, for our neighbours here across the fence, in Tulkarem, in Nur Shams, in Shuweika, in Qalqilya - we will turn you into rubble like we are doing now in the Gaza Strip, if the terror you

¹¹⁶ Bezael Smotrich, @BezaelSmotrich, Tweet (7:32 pm, 13 February 2024), <https://twitter.com/bezaelsm/status/1757457717206134790>.

¹¹⁷ Bezael Smotrich, @bezaelsm, Tweet (7:25 pm, 13 April 2024), <https://twitter.com/bezaelsm/status/1779199282731532417>.

¹¹⁸ Bezael Smotrich, @bezaelsm, Tweet (7:25 pm, 13 April 2024), <https://twitter.com/bezaelsm/status/1779199279740940468>.

¹¹⁹ Bezael Smotrich, @bezaelsm, Tweet (9:05 am, 14 April 2024), <https://twitter.com/bezaelsm/status/1779405563555668180>.

¹²⁰ Israeli Army Radio GLZ, @GLZRadio, Tweet (8:49 am, 15 April 2024), <https://twitter.com/GLZRadio/status/1779764062433284213>. Also available at B.M., @ireallyhateyou, Tweet (12:37 pm, 21 April 2024), <https://twitter.com/ireallyhateyou/status/1781995666593456397>.

¹²¹ “Statement By Israel’s Minister of Finance Bezael Smotrich at Mimouna In Ofakim / Sponsored by B.M. Tech LTD.”, *Beer Sheva Times* (30 April 2024), <https://www.youtube.com/watch?v=poyayz7b6jI>; Noa Shpigel, “Israel’s Far-right Minister Smotrich Calls for ‘No Half Measures’ in the ‘Total Annihilation’ of Gaza”, *Haaretz* (30 April 2024), <https://www.haaretz.com/israel-news/2024-04-30/ty-article/premium/smotrich-calls-for-no-half-measures-in-the-total-annihilation-of-gaza/0000018f-2f4c-d9c3-abc-f7f7d25460000>.

¹²² Department of the Taoiseach, *Ireland recognises the State of Palestine* (22 May 2024), <https://www.gov.ie/en/press-release/1b086-ireland-recognises-the-state-of-palestine/#>; Department of the Taoiseach, *Speech by Taoiseach Simon Harris as Ireland recognises the State of Palestine* (22 May 2024), <https://www.gov.ie/en/speech/b4c3b-recognition-of-the-state-of-palestine-remarks-by-an-taoiseach-simon-harris-td/>.

¹²³ Bezael Smotrich, @bezaelsm, Tweet (10:29 am, 22 May 2024), <https://x.com/bezaelsm/status/1793197386501607713>.

¹²⁴ U.S. Department of the Treasury, *Remarks by Secretary of the Treasury Janet L. Yellen at Press Conference Ahead of the G7 Finance Ministers and Central Bank Governors Meetings* (23 May 2024), <https://home.treasury.gov/news/press-releases/jy2363>.

exert on this area continues. And another message to the citizens of Israel, if God forbid a Palestinian state will be [instated] here, then what happened on October 7th in the Gaza Envelope settlements will, God forbid, happen here. This thing will not arise and will not come to pass. We will strike at terrorism, we will maintain control of the Judea and Samaria territory, because that is the security buffer for the settlements here along the Seam Zone and for the large cities west of here within the State of Israel.”¹²⁵

- On 10 June 2024, in a cabinet meeting, the Minister called for parading the bodies of dead Palestinian captives, stating “we should place the bodies in carts and drag them through the city center like they did in the Bible, for all to see and fear.”¹²⁶
- On 2 July 2024, he posted on X: “We have completely lost it. We are reconstructing Gaza with our own hands. Before demilitarisation. And especially the hospitals, meaning the terror centres. Mister Prime Minister, stop this folly. This time we will not be able to say that we didn’t know like [we said] with the release of the director of the terrorist HQ in Shifa yesterday.”¹²⁷
- On 18 July 2024, he tweeted that “A Palestinian state cannot be established because there is no such thing as a Palestinian nation!”.¹²⁸ He also called for annexing the West Bank in response to the ICJ’s Advisory opinion of 19 July 2024 on the *Legal Consequences arising from the Policies and Practices of Israel in the Occupied Palestinian Territory, including East Jerusalem*.¹²⁹
- On 15 July 2024, the Minister condemned the United States’ sanctions against certain groups of Israeli nationals for their protests and blockade of the entry into Gaza of any humanitarian supplies: “It should be remembered that these sanctions started against the settlement and the settlers. They have one goal to fight the settlement enterprise and force upon us the establishment of a terrorist state that will endanger the existence of the State of Israel. The sanctions now imposed against Order 9 [Tzav 9] are sanctions that violate the most basic democratic rights: freedom of expression and freedom of protest. It is possible to debate whether humanitarian aid should or should not be allowed to enter, certainly the citizens of the State of Israel who have abducted brothers and sisters who are now dying in Hamas tunnels are allowed to argue that aid should not be allowed to enter.”¹³⁰
- On 1 September 2024, the Minister urged that “[t]he Gaza Strip must shrink this morning. IDF forces should move 2 km inward from the current border and clear everything in their way. This is a territory that will never return to the Gazans. Even in difficult heart-rending moments, reason and national responsibility must prevail and guide our decision-making.”¹³¹
- On 21 October 2024, the Minister ‘tweeted’: “There is no security without settlement. We will settle Gaza and make it flourish because this is our land”.¹³²

¹²⁵ Minister of Finance of Israel, Bezalel Smotrich, @bezalelsm, Tweet (12:22 pm, 30 May 2024), <https://x.com/bezalelsm/status/1796124951088337026>.

¹²⁶ “Smotrich: ‘We Should Put The Bodies In A Cart And Drag Them Through The City Center’ | Full Quotes From The Cabinet [Meeting]”, *Maariv* (editorial) (10 June 2024), <https://www.maariv.co.il/news/politics/Article-1106243>.

¹²⁷ Bezalel Smotrich, @bezalelsm, Tweet (9:19 am, 2 July 2024), <https://x.com/bezalelsm/status/1808037854297141620>.

¹²⁸ Bezalel Smotrich, @bezalelsm, Tweet (11:09 am, 18 July 2024), <https://x.com/bezalelsm/status/1813863577520107922>.

¹²⁹ “Smotrich, Ben Gvir call for annexing West Bank in response to ICJ ruling”, *The Times of Israel* (19 July 2024), https://www.timesofisrael.com/liveblog_entry/smotrich-ben-gvir-call-for-annexing-west-bank-in-response-to-icj-ruling/.

¹³⁰ Minister of Finance Bezalel Smotrich, @bezalelsm, Tweet (7:13 pm, 15 July 2024), <https://x.com/bezalelsm/status/1812898356726759647>.

¹³¹ Bezalel Smotrich, @bezalelsm, Tweet (9:07 am, 1 September 2024), <https://x.com/bezalelsm/status/1830140531164237947>. Also available at Sam Sokol, “Smotrich blasts ‘surrender deal’ in response to Gallant’s call to reverse cabinet decision on Philadelphia Corridor”, *Times of Israel* (1 September 2024), https://www.timesofisrael.com/liveblog_entry/smotrich-blasts-surrender-deal-in-response-to-gallants-call-to-reverse-cabinet-decision-on-philadelphia-corridor/.

¹³² Bezalel Smotrich, @bezalelsm, Tweet (5:13 pm, 21 October 2024), <https://x.com/bezalelsm/status/1848382140594925712>.

- On 25 November 2024, the Minister stated at a Conference: “It is possible and necessary to conquer the Gaza Strip. We should not be afraid of this word. It is possible and necessary to take responsibility for civilians there. An imperative condition. . . there is no doubt that encouraging voluntary emigration, and this too in my opinion is an opportunity being opened with the new regime, here too, I think that the less we talk about it we can do more . . . It is possible to create a situation in which Gaza in two years counts less than half of its current population, it’s a different world, all the discussions about “the day after” will look completely different, with total control of the State of Israel . . . ”¹³³

**Israeli Minister for Foreign Affairs, Gideon Sa’ar
Member of the Israeli Security Cabinet**

15. New Hope MK Gideon Sa’ar, formerly a Minister without portfolio in the Israeli government and member of the Security Cabinet (until 25 March 2024),¹³⁴ rejoined the government on 30 September 2024 without Portfolio, but with a seat in the Security Cabinet.¹³⁵ On 8 November 2024 he was appointed Minister of Foreign Affairs.¹³⁶ Statements made by Gideon Sa’ar dehumanising Palestinians and demonstrating genocidal intent and incitement to genocide include:

- On 14 October 2023, he stated: “Territorially, Gaza must be smaller by the end of the war. First of all, it’s a security issue . . . [creating a buffer zone] [b]oth in the east and in the north. And they must lose this territory. First, it’s for security [reasons], second: [it is] a price of defeat that the Arabs understand . . . They have to pay the price of loss. Human life, or damage to property, is much less important for them. This is a thing they understand. . . ”¹³⁷ He further promoted his interview stating “The Hamas and Gaza need to lose three things: military capabilities, government and territory. Watch the interview with Amit Segal and Ben Caspit.”¹³⁸
- On 11 March 2024, after 68 orphans had been evacuated from Gaza to the West Bank,¹³⁹ he stated: “Transferring Palestinian orphans from Gaza to Judea and Samaria [the West Bank] — is wrong. Hiding the matter from the Defense Cabinet — is a severe [infraction]. And the bottom line: it doesn’t seem like this move won us any substantial diplomatic credit . . . ”¹⁴⁰

**Israeli Minister for National Security (until 19 January 2025), Itamar Ben-Gvir
Member of the Israeli Security Cabinet**

16. Israeli Minister for National Security until 19 January 2025, Itamar Ben-Gvir — the leader of the Otzma Yehudit (Jewish Power) Party in Benjamin Netanyahu’s coalition government until 19 January 2025 — was a member of Israel’s Security Cabinet. As Minister, he was constitutionally responsible for law enforcement and

¹³³ Kann News, @kann_news, Tweet (8 :21 pm, 25 November 2024), https://x.com/kann_news/status/1861143153098539289, translation also at <https://x.com/PixieOfDeath/status/1861355628070875635>.

¹³⁴ Sam Sokol, “Gideon Sa’ar quits coalition after Netanyahu fails to appoint him to war cabinet”, *The Times of Israel* (25 March 2024), <https://www.timesofisrael.com/gideon-saar-quits-coalition-after-netanyahu-fails-to-appoint-him-to-war-cabinet/>.

¹³⁵ “As he officially rejoins government, Sa’ar blasts opposition for ‘living in Oct. 6’”, *Times of Israel* (30 September 2024), <https://www.timesofisrael.com/as-he-officially-rejoins-government-saar-blasts-opposition-for-living-in-oct-6/>; Lazar Berman, “Ministers vote to grant Sa’ar a spot in security cabinet”, *The Times of Israel* (30 September 2024), https://www.timesofisrael.com/liveblog_entry/ministers-vote-to-grant-saar-a-spot-in-security-cabinet/.

¹³⁶ “Knesset approves Katz as defense minister, Sa’ar as FM after Gallant’s firing”, *The Times of Israel* (8 November 2024), <https://www.timesofisrael.com/knesset-approves-katz-as-defense-minister-saar-as-fm-after-gallants-firing/>.

¹³⁷ Yosi Shahbar, @yosi_shahbar, Tweet (6:52 pm, 14 October 2023), <https://twitter.com/ShbrYwsy/status/1713236279855382801>.

¹³⁸ Gideon Sa’ar, @gidonsaar, Tweet (7:57 pm, 14 October 2023), <https://x.com/gidonsaar/status/1713252741500318088>.

¹³⁹ D. Parvaz, “68 orphans were evacuated from Gaza to the West Bank, enraging Israel’s far right”, *NPR* (13 March 2024), <https://www.npr.org/2024/03/13/1238227682/orphans-gaza-rafah-israel-west-bank-sos-childrens-village-international>.

¹⁴⁰ Gideon Sa’ar, @gidonsaar, Tweet (9:44 pm, 11 March 2024), <https://x.com/gidonsaar/status/1767275480753860962>.

the Israeli Border Police, including operations in the West Bank. He is also responsible for Israel's Prison Services. He lives in the illegal Israeli settlement of Kiryat Arba on the outskirts of Hebron in the occupied Palestinian territory. He has made numerous statements since 7 October 2023 dehumanising Palestinians; evidencing genocidal intent; and inciting his 259.1K followers on X to genocide against Palestinians in Gaza, including the following:

- On 17 October 2023, he 'tweeted' that "as long as Hamas does not release the hostages in its hands — the only thing that should enter Gaza is hundreds of tons of Air Force explosives, not a gram of humanitarian aid."¹⁴¹
- On 11 November 2023, he declared in an interview on Israeli television the Israeli government's intention to attack all Palestinian civilians perceived as "involved" with the actions of Palestinian armed groups, stating: "and by the way, when I say we need to annihilate Hamas, it's not just Hamas, [not just] those who are registered, it's also the distributors of candy . . . So it be clear what we need to do in this war: The distributors of candy, the distributors of candy, those who support, those who sing, they too [we] need to eliminate."¹⁴²
- On 20 November 2023, on Channel 15, he stated "I'm proud of these things. This is my policy. This is what I wanted for 9 months. Finally it is being internalised. I think that we need the death penalty for terrorists. That we need to solve the overcrowded problem in prisons and kill the terrorists but until this happens, this policy of clear things". He described the detainees as restrained in the cells, tied by their legs, and stated: "but what I see is very good work by the IPS. The cells have nothing, no equipment, no luxuries . . . this is all out not only from the Nukhba prisoners but also from the additional wards of other terrorists. This is what I demanded from IPS . . . these are human scum, they don't deserve anything from what the law allows."¹⁴³ The United Nations Commission of Inquiry affirmed that "[m]istreatment of Palestinian detainees by Israeli authorities is the result of an intentional policy. . . Detainees, including older persons and children, were subjected to consistent mistreatment, including lack of sufficient food and appropriate hygiene facilities, beatings, abusive language and being forced to perform humiliating acts. Israeli security forces committed those acts with the intent to inflict pain and suffering, amounting to torture as a war crime and a crime against humanity . . . [t]his systematic abuse is directly and causally linked to statements made by Israeli officials, including the Minister of National Security, who is responsible for the Israel Prison Service, and other members of the Israeli coalition Government legitimizing revenge and violence against Palestinian".¹⁴⁴
- On 12 December 2023, he stated — in opposition to news reports that there had been changes to the open fire regulations for the Israeli army in Gaza — that "[t]here are no innocents in the Gaza Strip . . . The lives of our soldiers are more important than the lives of the enemy's children".¹⁴⁵

¹⁴¹ Itamar Ben-Gvir, @itamarbengvir, Tweet (8:00 pm, 17 October 2023), <https://twitter.com/itamarbengvir/status/1714340519487176791>.

¹⁴² "Interview with Itamar Ben-Gvir on Channel 12", Jewish Power (11 November 2023), <https://www.youtube.com/watch?v=2yRI-cc-D3w> [10:09 onwards].

¹⁴³ Minister Ben Gvir: "We have to stand up for ourselves and Delek had to be a red line", *Now 14* (21 November 2023), <https://www.youtube.com/watch?v=RKZuoEIiaTc>, also available at Yehuda Shaul, @YehudaShaul, Tweet (1:42 pm, 27 August 2024), <https://x.com/YehudaShaul/status/1828397646375002446>.

¹⁴⁴ UNGA, *Report of the Independent International Commission of Inquiry on the Occupied Palestinians Territory, including East Jerusalem, and Israel*, A/79/232 (11 September 2024), <https://undocs.org/A/79/232>, paras. 101-110, specifically para. 103.

¹⁴⁵ Hallel Bitton Rosen and Elhanan Mazoz, "At the height of the fighting: the IDF tightened the instructions for the use of fire in the Gaza Strip", *Now 14* (12 December 2023), <https://www.now14.co.il/article/895071>.

- On 1 January 2024, he posted on X: “We must promote the solution to encourage emigration of the residents of Gaza. It is a correct, just, moral and humane solution. We have partners around the world whose assistance we could use. Encouraging the emigration of the residents of Gaza will allow us to bring home the residents of the [Gaza] Envelope and the residents of Gush Katif.”¹⁴⁶
- On 17 January 2024, in an interview with Israeli news channel Yedioth Ahronoth, he called for “a large operation of moving” Palestinians,¹⁴⁷ as he previously highlighted the “importance” of Jewish settlement in Gaza.¹⁴⁸
- On 28 January 2024 — two days after the International Court of Justice’s January Order — speaking at a pro-settlement conference in Jerusalem, entitled ‘Victory of Israel: Settlement Brings Security’ (see above), he explicitly called for the Israeli resettlement of Gaza and the West Bank, advocating for the “return home to Gush Katif [in Gaza] and northern Samaria [in the West Bank]”.¹⁴⁹ He asserted a biblical right of Israel to the West Bank and Gaza, stating “this is the Torah, this is morality, this is historical justice”, and stating that such return was “our victory image together” because it is our “understanding that it has been ours since forever and ever.”¹⁵⁰ He referenced the Hebrew Bible in advocating for the Israeli resettlement of Gaza, stating that it would be “to uphold what our Torah said, and says, ‘you shall dispossess all the inhabitants of the land’ [Numbers 33:52], [b]ut if you do not dispossess the inhabitants of the land, those whom you allow to remain shall be stings in your eyes’ [Numbers 33:55].”¹⁵¹
- On 28 January 2024, he also reposted with approval a ‘tweet’ by MK Limor Son Har-Melech, depicting the MK participating in a protest to block aid into Gaza at the Kerem Abu Salem/ Karem Shalom crossing and calling for the cessation of aid “for the residents of Gaza”.¹⁵²
- On 29 January 2024, he wrote to the Prime Minister seeking permission for Israeli “forces to shoot anyone who enters the area of the security strip” on the basis that “anyone who enters there, is kill-worthy! [needs to be killed, deserving of death]!”¹⁵³ The ‘security strip’ refers to a kilometre-deep buffer zone which Israel has carved deep into Palestinian territory, destroying all buildings within the Gaza Strip that are within a kilometre of the Israel-Gaza fence,¹⁵⁴ as well as greenhouses and agricultural land.¹⁵⁵
- On 6 February 2024, subsequent to reports that Minister without Portfolio and Member of the War Cabinet, Benny Gantz, and Minister without Portfolio and Observer to the War Cabinet, Gadi Eisenkot, had advocated for the reduction of

¹⁴⁶ Itamar Ben-Gvir, @itamarbengvir, Tweet (2:59 pm, 1 January 2024), <https://x.com/itamarbengvir/status/1741821404515848688>.

¹⁴⁷ “Ben Gvir joined the ‘Conception Cabinet’ - but made it clear that he would not resign: ‘I am influential’”, *Ynet* (17 January 2024), <https://www.ynet.co.il/news/article/rjtbmwhfp>.

¹⁴⁸ Sam Sokol, “Far-right ministers call to ‘resettle’ Gaza’s Palestinians, build settlements in Strip”, *The Times of Israel* (1 January 2024), <https://www.timesofisrael.com/ministers-call-for-resettling-gazas-palestinians-building-settlements-in-strip/>.

¹⁴⁹ “Minister Ben-Gvir’s Speech: it is time to return to Gush Katif”, *Jewish Power* (28 January 2024), <https://www.youtube.com/watch?v=MmGUIYpanqs>.

¹⁵⁰ *Ibid.*

¹⁵¹ ‘For the Victory of Israel’ conference | Settlement brings security | The speech of the Minister of National Security Itamar Ben Gavir”, @STV-Live (28 January 2024), <https://www.youtube.com/watch?v=TKptg0Lp2w0>.

¹⁵² Itamar Ben-Gvir, @itamarbengvir, Tweet (2:15 pm, 28 January 2024), <https://twitter.com/itamarbengvir/status/1751609975992922496>.

¹⁵³ Itamar Ben-Gvir, @itamarbengvir, Tweet (1:47 pm, 29 January 2024), <https://twitter.com/itamarbengvir/status/1751965248771281277>.

¹⁵⁴ UN OHCHR, *Widespread destruction by Israeli Defence Forces of civilian infrastructure in Gaza* (8 February 2024), <https://www.ohchr.org/en/press-releases/2024/02/widespread-destruction-israeli-defence-forces-civilian-infrastructure-gaza>.

¹⁵⁵ Jon Gambrell, “Analysis shows destruction and possible buffer zone along Gaza Strip’s border with Israel”, *AP* (2 February 2024), <https://apnews.com/article/israel-palestinians-war-gaza-strip-buffer-zone-72a782ddd532a4331b660a735e36acb0>.

humanitarian aid to Gaza,¹⁵⁶ Itamar Ben-Gvir issued a statement on X (formerly twitter): “123 days [now] I’ve objected to allowing any kind of humanitarian aid in for the murderers from Gaza. Gantz finally remembered to meekly add his voice to my position this evening. . . It is now up to him to align with the rest of my firm positions: No to a lawless [as in: irresponsible] deal and no to stopping the war.”¹⁵⁷

- On 11 February 2024, addressing the Chief of the General Staff of the Israeli army in a meeting of the Security Cabinet, he reiterated that: “[i]t can’t be that kids and women get close to the fence. Whoever comes close to the fence, to chip [at our defence], to weaken security, should get a bullet.”¹⁵⁸
- On 22 February 2024, he denied the existence of the Palestinians as a national, ethnical or racial group when he told reporters: “there is no such thing as [a] Palestinian people, right? It’s a made-up people.”¹⁵⁹ These comments echoed statements by fellow Ministers, including Bezalel Smotrich a year earlier¹⁶⁰ and Orit Strock (see below).
- On 29 February 2024, he publicly praised the Israeli soldiers responsible for the deaths of 118 starving Palestinians in the ‘flour massacre’ in Gaza of 29 February 2024, asserting that they had “performed excellently against a Gazan mob that tried to harm them”.¹⁶¹ Despite the developing situation of famine in Gaza, and notwithstanding the January Order by the International Court of Justice, he publicly called for the blocking of aid to Gaza’s starving population, commenting on X — in a post with over three million views:

“We should give absolute support and backing to our heroic fighters operating in Gaza, who performed excellently against a Gazan mob that tried to harm them. Today was proof that transferring humanitarian aid to Gaza is not only madness while our hostages are being held in the Strip under substandard conditions, but that it also endangers the soldiers of the IDF. This is another clear-cut reason why we must stop transferring this aid, which is in fact aid meant to harm the IDF soldiers and [is] oxygen for Hamas.”¹⁶²

- On 11 March 2024, he criticised even the minor ‘command citation’ given to Israeli Brigadier Barak Hiram for his — unsanctioned — intentional demolition of Israa University in Gaza,¹⁶³ asserting that the Brigadier is “a hero and the kind of commander we need more of in the IDF”; and that “[i]t’s about time our military command stopped being frightened and deterred by international pressure”.¹⁶⁴
- On 13 March 2024, he described 12-year-old Palestinian child, Rami Hamdan Al-Halhouli — shot dead the previous evening by an Israeli soldier in the West Bank for having allegedly thrown a firework — as a “terrorist”.¹⁶⁵

¹⁵⁶ Yaron Avraham, “The surprising proposal of Gantz and Eisenkot: to limit the humanitarian aid that enters the Gaza Strip”, *Mako* (31 January 2024), https://www.mako.co.il/news-military/2024_q1/Article-b29cf0b90806d81026.htm.

¹⁵⁷ Itamar Ben-Gvir, @itamarbengvir, Tweet (7:42 pm, 6 February 2024), <https://x.com/itamarbengvir/status/1754923436881674506>.

¹⁵⁸ Shirir Avitan Cohen, “The Chief of Staff: ‘This is the third time we are having this conversation’; Ben Gvir: ‘We will have it the fourth and fifth time as well’”, *Israel Hayom* (11 February 2024), <https://www.israelhayom.co.il/news/geopolitics/article/15248717>.

¹⁵⁹ Liran Tamari and Sharon Kidan, “Ben-Gvir in the site of the attack: there is no Palestinian people, they did not need an excuse to inflame the area”, *Ynet* (22 February 2024), <https://www.ynet.co.il/news/article/rkzz000n3a>.

¹⁶⁰ “Smotrich says there’s no Palestinian people, declares his family ‘real Palestinians’”, *The Times of Israel* (20 March 2023), <https://www.timesofisrael.com/far-right-lawmaker-bezalel-smotrich-declares-himself-his-family-real-palestinians/>.

¹⁶¹ Itamar Ben-Gvir, @itamarbengvir, Tweet (3:37 pm, 29 February 2024), <https://twitter.com/itamarbengvir/status/1763196768458604583>.

¹⁶² *Ibid.*

¹⁶³ Elisha Ben Kimon, “IDF Gaza Division commander reprimanded for blowing up Gaza university”, *Ynet News* (11 March 2024), <https://www.ynetnews.com/article/b1r65v2ap>.

¹⁶⁴ Israeli Army Radio GLZ, @GLZRadio, Tweet, (9:35 am, 11 March 2024), <https://twitter.com/GLZRadio/status/1767091858302181708>.

¹⁶⁵ “‘Exemplary job’: Israel’s Ben-Gvir hails the killing of Palestinian boy in Jerusalem”, *Middle East Eye* (13 March 2024), https://www.youtube.com/watch?v=H0H_2_fMWuI.

- On 22 March 2024, he ‘tweeted’ his clear view that Israeli soldiers — including those deployed in Gaza — who openly advocate for the resettlement of Gaza, are doing “exactly as expected of an IDF officer” and deserve “absolute backing and plenty of appreciation”.¹⁶⁶
- On 14 April 2024, he publicly rejected the proposition that Israel should be bound by fundamental principles of international law, stating that “Israel’s response must not be small and insignificant . . . The paradigms of restraint [and] measured response are paradigms that lost their relevancy after the seventh of October. To create deterrence in the Middle East — the landlord must go crazy.”¹⁶⁷
- On 27 April 2024, at a Security Cabinet meeting, he called for detained Palestinians to be killed stating: “Why are there so many arrests . . . Can’t you kill some? Do you want to tell me they all surrender? What are we to do with so many arrested? It’s dangerous for the soldiers.”¹⁶⁸
- On 15 May 2024, after the commencement of Israel’s invasion of Rafah, he stated: “[W]e, in the cabinet, demand: war now! Demand to enter Rafah . . . The solution is the solution that the Torah tells us: it is to liberate, to settle and also to bequeath! The solution is to encourage emigration [of Palestinians] and tell them, willingly: go to your homes, go to your countries. This has always been ours and will stay ours!”¹⁶⁹
- On 21 May 2024, in an interview broadcast on Israeli television, he called for the Israeli army to “go all-out into Rafah, wage an all-out war”, advocating for the “Complete occupation of Gaza, everything. . . Full Israeli rule, Jewish settlement. But [that is] not enough. One more step, which is the most important step. . . Voluntary encouragement of emigration, yes, and by the way I’m not saying everyone — . . . you have many more to bring in [to the Strip]. And if emigration will happen and hundreds of thousands will leave, you can bring in even more and more and more people. . . I would be very happy to live in Gaza”.¹⁷⁰
- On 22 May 2024, in the wake of the announcement by Ireland, Norway and Spain that they would recognise the State of Palestine,¹⁷¹ he entered the Al Aqsa mosque compound — in a move described as a “deliberate provocation” by Palestinians — where he proclaimed: “We need to enter Rafah completely, perform a root canal, and in order to bring back our captives, we need to stop the fuel, establish that humanitarian aid will only be exchanged for humanitarian aid, and take control of this place.”¹⁷²
- On 5 June 2024, to members of the Israeli public gathered to celebrate ‘Jerusalem Day’ — the celebration marking the start of Israel’s occupation of East Jerusalem — he stated: “For victory, we need to enter all of Gaza and fight

¹⁶⁶ Itamar Ben-Gvir, @itamarbengvir, Tweet (4:11 pm, 22 March 2024), <https://twitter.com/itamarbengvir/status/1771177838403543063>.

¹⁶⁷ Itamar Ben-Gvir, @itamarbengvir, Tweet (2:35 pm, 14 April 2024), <https://twitter.com/itamarbengvir/status/1779488633315025303>.

¹⁶⁸ “Ben Gvir said to ask IDF chief why so many Gaza gunmen arrested: ‘Can’t you kill some?’”, *The Times of Israel* (27 April 2024), <https://www.timesofisrael.com/ben-gvir-said-to-ask-idf-chief-why-so-many-gaza-gunmen-arrested-cant-you-kill-some/>.

¹⁶⁹ B.M. @ireallyhateyou, Tweet (8:58 pm, 15 May 2024), <https://x.com/ireallyhateyou/status/1790834056088686763>; “At Sderot settlement rally, Ben Gvir calls for ‘voluntary emigration’ of Gazans”, *Times of Israel* (14 May 2024), https://www.timesofisrael.com/liveblog_entry/at-sderot-settlement-rally-ben-gvir-calls-for-voluntary-emigration-of-gazans/.

¹⁷⁰ Yishai Cohen, “Minister Itamar Ben Gvir: Gaza Should Be Conquered And Settled By Jews, I’d Be Happy To Be The First One”, *Kikar Ha-Shabat* (21 May 2024), <https://www.kikar.co.il/%D7%94%D7%A8%D7%99%D7%90%D7%99%D7%95%D7%A0%D7%95%D7%AA/sdtng3>.

¹⁷¹ Department of the Taoiseach, *Ireland recognises the State of Palestine* (22 May 2024), <https://www.gov.ie/en/press-release/1b086-ireland-recognises-the-state-of-palestine/#>; Department of the Taoiseach, *Speech by Taoiseach Simon Harris as Ireland recognises the State of Palestine* (22 May 2024), <https://www.gov.ie/en/speech/b4c3b-recognition-of-the-state-of-palestine-remarks-by-an-taoiseach-simon-harris-td/>.

¹⁷² Itamar Ben-Gvir, @itamarbengvir, Tweet (10:58 am, 22 May 2024), <https://x.com/itamarbengvir/status/1793204664034365898>.

until victory. For victory, we need to encourage emigration from Gaza . . . It is in our strength, it is in our hands. There is no country in the world that gives fuel to its enemies. There is no country in the world that gives humanitarian aid to those who fight it. Therefore we must say for the honour of Jerusalem, for the honour of the people of Israel, there is no fuel . . . And we want victory!”¹⁷³

- On 7 June 2024, he further advocated on X that Israel “prevent fuel from entering Gaza, minimize the amount of humanitarian aid that enters”.¹⁷⁴
- On 18 June 2024, the Minister joined the inauguration of the new “lobby for the renewal of settlement in the Gaza Strip” in the Israeli Knesset, stating: “[w]e are committed to return to Gaza. We are committed to return to Northern Samaria, we’re committed to settle [other Israelis] there, committed to build settlements there [ourselves] . . . Not just Gush Katif! Everywhere in Gaza! . . . Wherever there are no Jews, murder appears and missiles appears . . . Emigration must be encouraged . . . [I]f we don’t encourage the emigration of people, [emigration] of our enemies, I’m not talking about — of course, it has to be voluntary”.¹⁷⁵
- On 30 June 2024, he stated in a video: “the Nukhba . . . I say that my preference is that they need to be taken down with a bullet to the head, to make a death penalty for the terrorists and to pass the proposed law of Otzma Yehudit [Jewish Power party] in the third call [in the Knesset]. Until then we will give them the minimum required by law, nothing more.”¹⁷⁶
- On 1 July 2024, he posted on X: “Releasing the director of the Shifa Hospital in Gaza, along with dozens of other terrorists, is gross security negligence. The time has come for the Prime Minister to stop Gallant and the head of the Shin Bet from setting an independent policy that is contrary to the positions of the Cabinet and the government.”¹⁷⁷
- On 2 July 2024, the Minister of National Security tweeted: “[o]ne of the ultimate goals I set for myself [as minister] is worsening the [incarceration] conditions for terrorists in prisons, and to reducing their rights to the minimum required by law [. . .] Once the war began I was finally able to lead the anticipated reform. The conditions of terrorists in prison were reduced to [a] minimum . . .”, further stating with respect to detainees from Gaza, “I already proposed a much simpler solution, enacting death sentence to terrorists, this would solve the problem of crowded prisons.”¹⁷⁸
- On 4 August 2024, in response to an investigation into soldiers’ rape of a Palestinian detainee, he stated: “The sight of military police officers arriving to arrest the best of our men in Sde Teiman is no less than shameful. I suggest the Defence Minister, the Chief of Staff and military authorities support the combatants and take a page from the Prison Service — no more ‘summer camps’

¹⁷³ Itamar Ben-Gvir, @itamarbengvir, Tweet (8:39 pm, 5 June 2024), <https://x.com/itamarbengvir/status/1798424369787805963>, also available at B.M., @ireallyhateyou, Tweet (8:47 pm, 13 June 2024), <https://x.com/ireallyhateyou/status/1801325514272997612>.

¹⁷⁴ Itamar Ben-Gvir, @itamarbengvir, Tweet (10:23 am, 7 June 2024), <https://x.com/itamarbengvir/status/1798994297972494634>.

¹⁷⁵ Hezkei Baruch, @HezkeiB, Tweet (3:11 pm, 18 June 2024), <https://x.com/HezkeiB/status/1803052912949506478>; Knesset Channel, @knessetT, Tweet (3:11 pm, 18 June 2024), <https://x.com/KnessetT/status/1803052887255155084>; Maya Lecker, “Far-right Israel’s Fantasies About Expansion Into Gaza and Lebanon Will Kill Us All”, *Haaretz* (18 June 2024), <https://www.haaretz.com/israel-news/haaretz-today/2024-06-18/ty-article/.highlight/israeli-far-rights-fantasies-about-expansion-into-gaza-lebanon-will-kill-us-all/00000190-2c0a-d5f5-a5d6-edea5b220000>.

¹⁷⁶ Itamar Ben-Gvir, @itamar_ben_gvir, TikTok (24 April 2024), https://www.tiktok.com/@itamar_ben_gvir/video/7361360392242646279?lang=en.

¹⁷⁷ Itamar Ben-Gvir, @itamarbengvir, Tweet (8:22 am, 1 July 2024), <https://x.com/itamarbengvir/status/1807661065464852879>.

¹⁷⁸ Minister of National Security of Israel, Itamar Ben-Gvir, @itamarbengvir, Tweet (8:53 am, 2 July 2024), <https://x.com/itamarbengvir/status/1808031178277925263>.

and tolerance [translator note: alternatively, ‘patience’] towards the terrorists. Fighters should receive full backing.”¹⁷⁹

- On 16 August 2024, in reference to a campaign to collect food donations for Gaza, mainly from Palestinian communities within the ‘48 borders’, he stated “[t]hose who give humanitarian aid to Gaza should be stripped of their citizenship. There are good and loyal people from the Bedouin population who fight shoulder to shoulder with us. But there are also those whose loyalty is first and foremost to Gaza, and they should be thrown out of the State of Israel”.¹⁸⁰
- On 1 December 2024, in an interview with Israeli Radio Station Kol Barama, Minister Ben-Gvir said: “[I am] seriously considering moving with my family to the Gaza Strip. It is definitely a possibility that is on the agenda. . . I am in favor of occupying territories in Gaza especially after October 7th. Encouraging voluntary migration and taking territories is the most important thing right now. When people resided in Gush Katif, there were no missiles towards Be’er Sheva and Ashkelon. As far as I’m concerned, ‘the day after’ in Gaza includes Jewish settlement. Voluntary emigration of Gaza residents should be encouraged.”¹⁸¹ That same date, he also said in an interview with Israeli Army Radio that “Ideas like settlement in Gaza are welcome, the only times we defeated our enemies were when we took territory away from them. But that doesn’t satisfy me – I also want to encourage emigration”.”¹⁸²
- On 19 December 2024, speaking from next to the Netzarim Corridor in Gaza, the Minister continued to advocate for Israel to “not withdraw from the Netzarim Corridor . . . stop the fuel supply” and for Israel to take “[m]ore territory and more territory, to occupy, and to say in a very, very explicit way to encourage voluntary emigration”.¹⁸³

**Israeli Minister of Energy and Infrastructure, Eli Cohen
Member of the Israeli Security Cabinet**

17. Genocidal statements by Israeli Minister for Energy and Infrastructure (formerly the Foreign Minister from 29 December 2022 to 1 January 2024), Security Cabinet member and Likud MK, Eli Cohen, include the following:

- On 18 October 2023 — in his former capacity as Foreign Minister — he stated on Israeli Army Radio that “[a]t the end of this war, not only will Hamas no longer be in Gaza, (but) also the territory of Gaza will decrease.”¹⁸⁴
- On 22 May 2024, subsequent to the announcement of the imminent recognition by Spain, Ireland and Norway of the State of Palestine,¹⁸⁵ he ‘tweeted’ to his 70,000 followers on X that “Spain, Ireland, and Norway want to give a state to these monsters who murdered, slaughtered, raped, and kidnapped our people.

¹⁷⁹ “Police call protesters in Sde Teiman to disperse: “The police will lose its patience”, *Maariv* (29 July 2024), <https://www.maariv.co.il/news/military/Article-1120826>.

¹⁸⁰ Danny Beller, “Ben Gvir: ‘Revoke the Citizenship of Rahat Residents Involved with Aid for Gaza’”, *Be’er Sheva and the Negev News* (16 August 2024), <https://br7news.co.il/he/news/news-1723823194>.

¹⁸¹ “Ben Gvir: “I am seriously considering moving with my family to the Gaza Strip” *Kipa* (1 December 2024), <https://www.kipa.co.il/%D7%97%D7%93%D7%A9%D7%95%D7%AA/%D7%A4%D7%95%D7%9C%D7%99%D7%98%D7%99/1193362-0/>

¹⁸² GLZ Radio, @GLZRadio, Tweet (6:56 am, 1 December 2024), <https://x.com/GLZRadio/status/1863114866682146831>.

¹⁸³ Limor Sonhrmelh, @limor_sonhrmelh, Tweet (3:29 pm, 19 December 2024), https://x.com/limor_sonhrmelh/status/1869766910029795564; B.M., @ireallyhateyou, Tweet (3:25 pm, 26 December 2024), <https://x.com/ireallyhateyou/status/1872302617222918508>.

¹⁸⁴ Israeli Army Radio Galei Tzahal, @GLZRadio, Tweet (11:33 am, 18 October 2023), <https://twitter.com/GLZRadio/status/1714575523605545299>.

¹⁸⁵ Department of the Taoiseach, *Ireland recognises the State of Palestine* (22 May 2024), <https://www.gov.ie/en/press-release/1b086-ireland-recognises-the-state-of-palestine/#>; Department of the Taoiseach, *Speech by Taoiseach Simon Harris as Ireland recognises the State of Palestine* (22 May 2024), <https://www.gov.ie/en/speech/b4c3b-recognition-of-the-state-of-palestine-remarks-by-an-taoiseach-simon-harris-td/>.

They want to reward terrorism. From the river to the sea, there will be one state: The State of Israel.”¹⁸⁶

- On 9 June 2024, he ‘tweeted’, in relation to the Israeli attack on Nuseirat of 8 June 2024 — in which Israel rescued four Israeli hostages and killed at least 274 Palestinians, including 64 children and 57 women, and injured nearly 700 more Palestinians¹⁸⁷ — that “only Israel’s enemies complained about the casualties of Hamas terrorists and their accomplices, accusing Israel of war crimes.”¹⁸⁸

**Israeli Minister of Agriculture and Food Security, Avi Dichter
Member of the Israeli Security Cabinet**

18. Minister of Agriculture and Food Security and Likud MK, Avi Dichter — who sits as a member on the Security Cabinet — has made numerous statements evidencing genocidal intent and inciting to genocide, including the following:

- On 11 November 2023, in a television interview, he recalled the Nakba of 1948, in which over 80 per cent of the Palestinian population of the new Israeli State was forced from or fled their homes, stating that “[w]e are now rolling [out] the Gaza Nakba”.¹⁸⁹ Soldiers on the ground in Gaza have themselves repeatedly referred to the aims and effects of the Israeli military operation in Gaza as being a second “Nakba”.¹⁹⁰
- On 8 April 2024, in language plainly echoing that of the Israeli President, he ‘tweeted’ to his 49,800 followers on X: “Uninvolved? Big-time involved! We will reckon with the third circle of Gazans as well — the same ones who rejoiced and cheered the massacre.”¹⁹¹
- On 18 April 2024, he posted on X: “The photo of Yarden Bibas on the motorcycle which kidnapped him from his home in Nir Oz to Gaza, as blood from blows he got from ‘uninvolved’ residents of Gaza drips from his head — This image doesn’t leave me. The [Bibas] family’s decision to share this difficult photo with the public reveals what’s behind the mask of so-called ‘uninvolved’ citizens in Gaza. The tens of thousands of greeters who waited in Gaza for their heroes, who brought along ‘loot’ from Nir Oz in the form of the Israeli hostages, crowds who abused and humiliated the hostages, whom some define as ‘uninvolved.’ Each one of these many thousands is a terrorist for all intents and purposes. Their days are numbered [the Hebrew idiom here says literally: Their blood is in their head, meaning, they are responsible for their own death] and they will be pursued to their last day in prison or buried in a grave, as is written: ‘You shall blot out the memory of Amalek from under heaven. Do not forget!’ [Deuteronomy 25:19] [We are] praying for their [the hostages’] safety and doing everything to bring everyone home. A day of “vengeance and recompense” [Deuteronomy 32:35] will come.”¹⁹²

¹⁸⁶ Eli Cohen, @elicoh1, (2:44 pm, 22 May 2024), <https://x.com/elicoh1/status/1793261698511405274>.

¹⁸⁷ UN OHCHR, *UN experts condemn outrageous disregard for Palestinian civilians during Israel’s military operation in Nuseirat* (14 June 2024), <https://www.ohchr.org/en/press-releases/2024/06/un-experts-condemn-outrageous-disregard-palestinian-civilians-during-israels>.

¹⁸⁸ Foreign Minister of Israel, Israel Katz, @Israel_katz, Tweet (10:22 am, 9 June 2024), https://x.com/Israel_katz/status/1799718685134721062.

¹⁸⁹ Interview with Avi Dichter on Channel 12, available on Hanno Hauenstein, @hahauenstein, Tweet (8:42 pm, 11 November 2023), <https://twitter.com/hahauenstein/status/1723441134221869453>.

¹⁹⁰ “The Patriots with Yanon Magal: 17.02.2024 | The full program”, *Now 14* (17 February 2024), <https://www.youtube.com/watch?v=cpafZO-PMmo> [1:20:28]. Also available at Younis Tirawi, @ytirawi, Tweet (10:15 pm, 18 February 2024), <https://twitter.com/ytirawi/status/1759310674142830602>. For statements made by Israeli soldiers, see Younis Tirawi, @ytirawi, Tweet (12:58 am, 6 February 2024), <https://twitter.com/ytirawi/status/1754640691425124386>.

¹⁹¹ Avi Dichter, @avidichter, Tweet (6:20 am, 8 April 2024), <https://twitter.com/avidichter/status/1777189787348177000>.

¹⁹² Avi Dichter, @avidichter, Tweet (8:26 pm, 18 April 2024), <https://x.com/avidichter/status/1781026584230551915>.

**Israeli Minister of Defence until 5 November 2024, Yoav Gallant
Formerly Member of the Security and War Cabinets**

19. The Israeli Minister of Defence, Yoav Gallant — who was a member of both the Israeli Security Cabinet and the now-disbanded Israeli War Cabinet — was the “Minister in charge of the Army on behalf of the Government”.¹⁹³ He is a member of the Prime Minister’s Likud party, who previously served as the Commander of the Southern Command of the Israeli Army. An arrest warrant was issued against him by Pre-Trial Chamber I of the ICC, on the same charges as the Israeli Prime Minister.¹⁹⁴ Statements by him — made in his capacity as Minister of Defence — evidencing genocidal intent and incitement to genocide, including those published to his 111.6K followers on X — a number of which were cited by the International Court of Justice in its Order of 26 January 2024 — include the following:

- On 7 October 2023, he stated: “15 years ago, when I was commander of the Southern Command, I was close to breaking Hamas’s neck. At the time, I was stopped by the political command . . . This phenomenon will not repeat itself. We will change the current reality for the next 50 years in the Gaza Strip. What once was will not be [again]. We will act with full force.”¹⁹⁵
- On 8 October 2023, after a visit to Ofakim [an Israeli town in the Gaza envelope], the Defence Minister stated: “we are responsible for this operation being remembered in Gaza for the next 50 years and they will regret starting it.” The Minister also said that “At this time, the IDF forces are attacking a number of locations in the Gaza Strip, attacks that will continue to escalate. The IDF is amassing large forces, we will strike Gaza as never seen before. The rules of war have changed, the price the Gaza Strip will pay will be a very heavy price that will alter reality for generations.”¹⁹⁶
- On 9 October 2023, in an Israeli Army ‘situation update’, he advised that: “We are laying a total siege on the city of Gaza. No electricity, no food, no water, no fuel. Everything is shut down. We are fighting human animals and we are acting accordingly.”¹⁹⁷ The Minister also posted his ‘situation update’ online, referring to Gaza as a whole.¹⁹⁸
- On 10 October 2023, he also instructed troops on the Gaza perimeter that he had “let all the breaks loose”,¹⁹⁹ stating in terms that: “you saw what we’re fighting with. We’re fighting with human animals. This is the ISIS of Gaza. This is what

¹⁹³ Israel, *Basic Law: The Army* (1976), available at <https://www.refworld.org/legal/legislation/natlegbod/1976/en/28150>.

¹⁹⁴ ICC, *Situation in the State of Palestine: ICC Pre-Trial Chamber I rejects the State of Israel’s challenges to jurisdiction and issues warrants of arrest for Benjamin Netanyahu and Yoav Gallant* (21 November 2024), <https://www.icc-cpi.int/news/situation-state-palestine-icc-pre-trial-chamber-i-rejects-state-israels-challenges>. See also, ICC, *Statement of ICC Prosecutor Karim A.A. Khan KC: Applications for arrest warrants in the situation in the State of Palestine* (20 May 2024), <https://www.icc-cpi.int/news/statement-icc-prosecutor-karim-aa-khan-kc-applications-arrest-warrants-situation-state>; Panel of Experts in International Law Convened by the Prosecutor of the ICC, *Report of the Panel of Experts in International Law* (20 May 2024), <https://www.icc-cpi.int/sites/default/files/2024-05/240520-panel-report-eng.pdf>.

¹⁹⁵ Yoav Zeitoun, “Gallant: ‘We will change the face of reality in Gaza for the next 50 years’”, *Ynet* (7 October 2023), <https://www.ynet.co.il/blogs/israelunderattack/article/blvqlmkz6>.

¹⁹⁶ Itay Blumenthal and Suleiman Masvidan, “The Chief of Staff in his first message: It is time for war”, *Kann News* (8 October 2023), <https://www.kan.org.il/content/kan-news/defense/560239/>.

¹⁹⁷ “Statement by Yoav Gallant”, *Knesset TV* (9 October 2023), <https://www.youtube.com/watch?v=1nxvS9VY-t0>. Also available at Emanuel Fabian, “Defense minister announces ‘complete siege’ of Gaza: No power, food or fuel”, *The Times of Israel* (9 October 2023), https://www.timesofisrael.com/liveblog_entry/defense-minister-announces-complete-siege-of-gaza-no-power-food-or-fuel/. See also *South Africa v. Israel, Provisional Measures, Order of 26 January 2024*, p. 17, para. 51.

¹⁹⁸ Yoav Gallant, @yoavgallant, Tweet (12:59 pm, 9 October 2023), <https://x.com/yoavgallant/status/1711335592942875097>.

¹⁹⁹ “Filmography: Ariel Harmoni, Ministry of Defense”, *Kipa News* (10 October 2023), <https://www.youtube.com/watch?v=l9wx7e4u-xM>. Also available in Emanuel Fabian, “Gallant: Israel moving to full offense, Gaza will never return to what it was”, *Times of Israel* (10 October 2023), https://www.timesofisrael.com/liveblog_entry/gallant-israel-moving-to-full-offense-gaza-will-never-return-to-what-it-was/.

we are fighting with, and I understand the pain. I'm telling you, you who suffered the casualties and the defense, I will say this to the division commander as well, we will avenge this thing inside Gaza, we will abolish Hamas. And we will get to whatever it takes. There will not be a situation where Israeli kids are killed here in the fields, and the people of Israel will keep behaving [itself]. I let all the breaks loose. We attack everything. Taking the gloves off, killing whoever is fighting against us, whether there is one terrorist on one hundred. From the air, from the land, with tanks and bulldozers, all means. No compromises. Gaza will not go back to what it was and Hamas will be no more. We will destroy everything. It will take time, it will not take a day, not take a week, it will take weeks and maybe months, we will get to every place. There will not be a situation where our brothers and our kids and our parents will be murdered as if we have no state and we can't arrive. We understand that Hamas wanted to change the situation. This will change, 180 degrees back, they will be sorry for this moment. They will be sorry."²⁰⁰

- On 15 October 2023, in a speech to Israeli military troops, he said "[t]his is a war between the children of light and the children of darkness."²⁰¹
- On 19 October 2023, he called on Israeli troops near the Gaza border, stating: "I implore you — every terrorist you see — kill [them]. That is the ruling."²⁰²
- On 4 November 2023, he stated: "Yahya Sinwar made a mistake and sealed the fate of Hamas and the fate of Gaza."²⁰³
- On 6 December 2023, he indicated the deliberateness of the Israeli military's destruction of Gaza, stating: "The greater our achievement in Gaza, the clearer things will become. Every person in Lebanon can pick up a map, an aerial photograph of Gaza, [superimpose] it over an aerial photograph of Beirut, and ask themselves whether this is what they want to happen there. The clearer our achievement [in Gaza], the clearer [in Lebanon] too."²⁰⁴
- On 13 December 2023, on a visit to the Israeli city Sderot, he said "the work in the north of the Strip, with all the prices and pain [it entails], is of the kind that crushes the surrounding infrastructure, like Beit Hanoun and its surroundings and its tunnels and the houses in the officers' neighbourhood, in Tel al-Hawa [a neighbourhood in Gaza city] — it's all been erased, this has significance."²⁰⁵ By 13 December 2023, Beit Hanoun was reported to have "barely a single inhabitable building" that "remain[ed] standing".²⁰⁶
- On 1 February 2024, it was reported that he told the delegation of ambassadors that UNRWA had "lost its legitimacy to exist" and is "an internationally funded organisation paid to kill Israelis".²⁰⁷

²⁰⁰ "Filmography: Ariel Harmoni, Ministry of Defense", *Kipa News* (10 October 2023), <https://www.youtube.com/watch?v=l9wx7e4u-xM>. Translation in *South Africa v Israel, Provisional Measures, Order of 26 January 2024*, p. 17, para. 52. See also *South Africa v. Israel, Application and Request for Provisional Measures of 29 December 2023*, p. 59, para. 101.

²⁰¹ "Gallant: 'This is a war between light and darkness'", *The Jerusalem Post* (15 October 2023), <https://www.jpost.com/israel-news/article-768470>.

²⁰² David Goldberg, "Gallant: Whoever sees Gaza from Afar, Will See it from Within. The Order Will Arrive. Watch" *JDN News* (19 October 2023), <https://www.jdn.co.il/video/2058206/>.

²⁰³ Yoav Zitun, "Galant toured the northern border: 'If Nasrallah Makes a Mistake, He Will Decide the Fate of Lebanon'", *Ynet* (7 November 2023), <https://www.ynet.co.il/news/article/h196u67xp>.

²⁰⁴ Tomer Cohen, "Defense Minister Galant: 'The more we succeed in Gaza, things will become clearer'", *TV 2000* (12 June 2023), <https://www.tv2000.co.il/news/37365>.

²⁰⁵ "Alon Davidi To Minister Galant: 'The Residents Won't Return Until They Feel Safe'", *Channel 7 News* (13 December 2023), <https://www.inn.co.il/news/623085>.

²⁰⁶ Crispian Balmer, "Gaza war inflicts catastrophic damage on infrastructure and economy", *Reuters* (17 November 2023), <https://www.reuters.com/world/middle-east/gaza-war-inflicts-catastrophic-damage-infrastructure-economy-2023-11-17/>.

²⁰⁷ Jessica Le Masurier and Damilola Banjo, "As Donors Suspend Critical Funding to UNRWA, Allegations Against Staff Remain Murky", *PassBlue* (5 February 2024) <https://www.passblue.com/2024/02/05/as-donors-suspend-critical-funding-to-unrwa-allegations-against-staff-remain-murky/>.

- On 1 February 2024, within a week of the ICJ's Order of 26 January 2024, speaking in Khan Younis to the 98th Division of the Israeli army, the Minister urged them "to reach all the places",²⁰⁸ repeating his statement of 10 October 2023.²⁰⁹
- On 3 March 2024, during a subsequent visit to the Gaza Border to meet with the 98th Division of the Israeli army, he described Israel's military operations as being that "We are taking apart neighbourhood after neighbourhood".²¹⁰
- On 13 March 2024, during his visit to troops stationed near the beach in Gaza, he again underscored — in relation to Israel's planned operation in Rafah in particular — that "we will reach everywhere . . .".²¹¹
- On 22 April 2024, in response to the threat by the United States to sanction the Netzah Yehuda Battalion of the Israeli army — who have been deployed to Gaza since October 2023 — due to widespread reports of serious abuses of human rights committed by them in the West Bank,²¹² he commented to the Battalion, on Gaza's border, that "no one in the world will teach us what morality is and what norms are",²¹³ effectively greenlighting their continuation of such violations.
- On 7 August 2024, the Minister of Defence emphasised his full awareness and the deliberateness of the Israeli military's destruction of Gaza again, stating: "As things stand, Nasrallah may drag Lebanon into paying very heavy prices, very heavy. They have no idea what could happen, I guess if they take a picture of Gaza they may understand but logic doesn't always prevail."²¹⁴

Israeli Minister without Portfolio until 9 June 2024, Benny Gantz
Formerly Member of the Security and War Cabinets

20. Former Minister without Portfolio and MK, Benny Gantz, was Minister and member of both the Israeli War Cabinet and Security Cabinet until 9 June 2024.²¹⁵ He is a retired Israeli General and was the Chief of Staff of Israel's military between 2011 and 2015,²¹⁶ and is the leader of the National Unity Party in Benjamin Netanyahu's coalition government. He previously served as Minister of Defence and, first Alternate, then Deputy, Prime Minister between 2020 and 2022. In his political campaign advert of 2019, he displayed footage of neighbourhoods in Gaza destroyed during Israel's 2014 military offensive on Gaza ('Operation Protective Edge'), during his tenure as the Israeli military's Chief of Staff. The video was titled: "6231 targets

²⁰⁸ Emanuel Fabian, "Gallant says army will push south to Rafah as Khan Younis offensive wraps up", *The Times of Israel* (1 February 2024), https://www.timesofisrael.com/liveblog_entry/gallant-says-army-will-push-south-to-rafah-as-khan-younis-offensive-wraps-up/.

²⁰⁹ *South Africa v. Israel, Order of 26 January 2024*, <https://www.icj-cij.org/sites/default/files/case-related/192/192-20240126-ord-01-00-en.pdf>, pp. 17-18, para. 52.

²¹⁰ Yanki Golden, "Gallant: 'We Will Not End This War Without Eliminating Hamas' Outlet: Hamechadesh News", *Hamechadesh News* (3 March 2024), <https://hm-news.co.il/451577/>.

²¹¹ "Action in Rafah soon? Galant in Gaza: 'We reach everywhere'", *Now 14* (13 March 2024), <https://www.now14.co.il/פעולה-ברפיח-בקרוב/>.

²¹² Democracy for the Arab World Now ('DAWN'), *Israel: Netzah Yehudah Battalion Carries Out War Crimes In the West Bank, Including the Killing of Palestinian-American Omar Assad* (29 November 2022), <https://dawnmena.org/culpit-netzah-yehuda-battalion/>.

²¹³ Emanuel Fabian, "Gallant to IDF unit slated for US sanctions: 'No one will teach us what morality is'", *The Times of Israel* (22 April 2024), https://www.timesofisrael.com/liveblog_entry/gallant-to-idf-unit-slated-for-us-sanctions-no-one-will-teach-us-what-morality-is/.

²¹⁴ Avi Ashkenazy, "Gallant: 'Nasrallah is dragging Lebanon, they have no idea what could happen'", *Maariv News* (07 August 2024), <https://www.maariv.co.il/news/military/Article-1123204>.

²¹⁵ Sam Sokol, "Gantz announces he is leaving coalition, says Netanyahu preventing 'true victory'", *Times of Israel* (9 June 2024), https://www.timesofisrael.com/liveblog_entry/gantz-announces-he-is-leaving-coalition-says-netanyahu-preventing-true-victory/.

²¹⁶ IDF, *Our Soldiers: Lt. Gen. Benny Gantz Concludes 38 Years of Dedicated Service* (16 February 2015), <https://www.idf.il/en/mini-sites/our-soldiers/lt-gen-benny-gantz-concludes-38-years-of-dedicated-service/>.

destroyed — parts of Gaza go back to the stone age”.²¹⁷ In his capacity as Minister without Portfolio, he made the following genocidal statements, including in ‘tweets’ to his 315.8K followers on X:

- On 7 October 2023, he stated that “Whoever decided to invade the territory of the State of Israel, massacre civilians, and undermine the foundations of our existence, will find his house collapsing, his own foundations shattered, his own reality changed. What we see in Gaza today — will be no more . . . We will defeat our enemies. The human animals that kidnapped our citizens will be exterminated. In this [military] campaign — it’s us or them. And it will be us. History has already proven that the State of Israel knows how to fight back, and the future will sear this insight from Gaza to Tehran. Our goal should be a profound change of reality in the Gaza Strip, and a broad message to all our enemies for decades ahead.”²¹⁸
- On 9 November 2023, he ‘tweeted’ that “If there were journalists who knew about the massacre, who remained silent and filmed as children were being massacred — they are no different than terrorists, and their fate should be the same.”²¹⁹
- On 31 January 2024, five days after the International Court of Justice’s January Order, he and War Cabinet ‘Observer’ Gadi Eisenkot advocated to the War Cabinet for the reduction of humanitarian aid to Gaza “as part of the pressure to build another mechanism in the Strip and also as part of the moves to return the captives.”²²⁰

Israeli Minister for Economy and Industry, Nir Barkat

21. Minister for Economy and Industry, Likud MK and former Mayor of Jerusalem, Nir Barkat, has made repeated statements dehumanising Palestinians, denying Israeli crimes, evidencing genocidal intent, and inciting genocide, including:

- On 21 October 2023, he warned in an interview that “Israel has a very clear message to our enemies. We are saying to them, look what’s happening in Gaza — you are going to get the same treatment if you attack us. We are going to wipe you off the face of the Earth.”²²¹
- On 5 February 2024, he ‘tweeted’ to his over 60,000 followers on X, to call for all humanitarian aid to be blocked to Gaza, stating that there should be “[z]ero aid until all hostages are fully released!”²²²
- On 4 April 2024, speaking on a United States television programme, he made clear his agreement with the view shared by the Israeli President that there are

²¹⁷ “Benny Gantz: ‘6,231 Targets destroyed - parts of Gaza go back to the stone age’”, *Haaretz.com* (20 January 2019), <https://www.youtube.com/watch?v=tBc3qojn-w0>; “‘Only the Strong Wins’: Netanyahu Rival Gantz Touts Gaza Destruction in New Campaign Ads”, *Haaretz* (20 January 2019), <https://www.haaretz.com/israel-news/elections/2019-01-20/ty-article/.premium/only-the-strong-wins-netanyahu-rival-gantz-touts-gaza-destruction-in-new-campaign/0000017f-e706-dc7e-adff-f7af74460000>; Raoul Wootliff, “‘Parts of Gaza sent back to Stone Age’: Gantz videos laud his IDF bona fides”, *The Times of Israel* (20 January 2019), <https://www.timesofisrael.com/only-the-strong-survive-gantzs-new-campaign-videos-laud-his-idf-bona-fides/>.

²¹⁸ “Gantz: Ready to Discuss Entering the Government and Establishing a War Cabinet”, *Srugim* (8 October 2023), <https://www.srugim.co.il/848907-%D7%92%D7%A0%D7%A5-%D7%9E%D7%95%D7%9B%D7%9F-%D7%9C%D7%93%D7%95%D7%9F-%D7%91%D7%9B%D7%A0%D7%99%D7%A1%D7%94-%D7%9C%D7%9E%D7%9E%D7%A9%D7%9C%D7%94-%D7%95%D7%9C%D7%94%D7%A7%D7%99%D7%9D-%D7%A7%D7%91%D7%99>.

²¹⁹ Benny Gantz, @gantzbe, Tweet (10:42 am, 9 November 2023), <https://x.com/gantzbe/status/1722535044755898630>. See also Benny Gantz, @gantzbe, Tweet (10:42 am, 9 November 2023) <https://x.com/gantzbe/status/1722535046400061853>.

²²⁰ Yaron Avraham, “The surprising proposal of Gantz and Eisenkot: to limit the humanitarian aid that enters the Gaza Strip”, *Mako* (31 January 2024), https://www.mako.co.il/news-military/2024_q1/Article-b29cf0b90806d81026.htm.

²²¹ Natalie Lisbona *et al.*, “Israel vows to cut off ‘the head of the snake’ and launch a military attack against Iran if Hezbollah joins the war with Hamas”, *The Daily Mail* (21 October 2023), <https://www.dailymail.co.uk/news/article-12657495/Israel-attack-against-Iran-Hezbollah-joins-war-Hamas.html?stream=top>.

²²² Nir Barkat, @NirBarkat, Tweet (7:36 pm, 5 February 2024), <https://twitter.com/NirBarkat/status/1754574757171790041>.

no innocent civilians in Gaza. When challenged about his failure to consider the humanitarian well-being of the people of Gaza, he used air-quotes to refer to the “innocent people in Gaza”. When questioned by the interviewer with “why do you put the word ‘innocent’ in quotes when you mentioned them — the women and children who are suffering”, Barkat replied that “what you saw in the attack on October 7th, is ‘innocent civilians’ entering Israel and taking part of those atrocities . . . the huge majority of them support October 7th, they give cover to the terrorists”. He asserted that “all of the children that are getting educated in Hamas, in Gaza, and in Judea and Samaria, are trained to kill Jews . . . They get a million dollars, a million dollars to kill a Jew.”²²³

- On 29 July 2024, in response to the temporary arrest of several Israeli soldiers for the rape of a Palestinian detainee from Gaza, he stated: “I support our fighters and call for the Minister of Defence to immediately halt the contemptible show trial against them. A country that wishes to live is obligated to support its brave fighters, thanks to whom it exists, certainly in times of war.”²²⁴

Israeli Minister of Intelligence/Science and Technology, Gila Gamliel

22. Minister of Science and Technology, former Minister of intelligence (between January 2023 and March 2024), and Likud MK Gila Gamliel has made various statements advocating for the “voluntary migration [of Palestinians from Gaza]” as “the best and most realistic program for the day after the fighting ends.”²²⁵ A Ministry of Intelligence report prepared under her Ministry proposed the forcible transfer of Palestinians in Gaza to Egypt’s Sinai desert.²²⁶ On 12 February 2024, she further ‘tweeted’: “UNRWA, which collaborates with Hamas, and some of whose workers participated in the massacres and abductions on October 7th, is not part of the solution, but part of the problem. We will continue our work to replace this dangerous organization with other bodies that are not infected with terrorism and deny other countries from the continued funding of UNRWA”.²²⁷

Israeli Minister of Social Equality and the Advancement of the Status of Women, May Golan

23. Likud MK May Golan is Israel’s Minister of Social Equality and the Advancement of the Status of Women, the ministry which “works to promote populations of senior citizens, the young, women, and minorities”.²²⁸ Prior to being appointed as Minister of Social Equality, she was withdrawn by the Prime Minister for an Israeli Consul General position to New York subsequent to concerns raised by the United States State Department about racist statements she had made. The State Department asserted that they “would condemn such kind of rhetoric and believe that such kind of language is also particularly damaging when it’s amplified in leadership positions”.²²⁹

- On 7 October 2023, during a meeting of the Israeli cabinet, she asserted that “Gaza’s infrastructure must be utterly destroyed and their electricity must be cut

²²³ “Israeli minister calls strike on aid workers ‘a mistake’ and ‘part of war’”, *MSNBC* (4 April 2024), <https://www.msnbc.com/morning-joe/watch/israeli-minister-calls-strike-on-aid-workers-a-mistake-and-part-of-war-208304709616> [15:00 - 19:00].

²²⁴ Nir Barkat, @NirBarkat, Tweet (6:44 pm, 29 July 2024), <https://x.com/NirBarkat/status/1817964474545975542>.

²²⁵ Shalom Yerushalmi, “Israel in talks with Congo and other countries on Gaza ‘voluntary migration’ plan”, *The Times of Israel* (3 January 2024), <https://www.timesofisrael.com/israel-in-talks-with-congo-and-other-countries-on-gaza-voluntary-migration-plan/>.

²²⁶ Yuval Abraham, “Expel all Palestinians from Gaza, recommends Israeli gov’t ministry”, *+972 Magazine* (30 October 2023), <https://www.972mag.com/intelligence-ministry-gaza-population-transfer/>.

²²⁷ Gila Gamliel, @GilaGamliel, (7:40 pm, 12 February 2024), <https://twitter.com/GilaGamliel/status/1757037027902595453>.

²²⁸ See Government of Israel, *Ministry for Social Equality*, https://www.gov.il/en/departments/ministry_for_social_equality/govil-landing-page.

²²⁹ “May Golan won’t be appointed consul of Israel in New York – report”, *i24 news* (23 April 2023), <https://www.i24news.tv/en/news/israel/diplomacy/1682239678-may-golan-won-t-be-appointed-consul-of-israel-in-new-york-report>.

off immediately. The war is not against Hamas but against the state of Gaza.” Then-Minister of Energy Israel Katz replied: “I instructed, together with the Attorney General, for electricity to be cut off immediately.”²³⁰

- On 9 November 2023, she advocated for the killing of Palestinian civilians by ‘tweeting’: “We need to eliminate and thwart all the collaborators, in silence and in active support of the Nazis in Hamas! The supporters and helpers of the Nazis should also die. This is true both for ‘journalists’ and for all those ‘innocent uninvolved’.”²³¹
- On 19 February 2024, speaking in the Knesset in favour of a vote to expel MK Ofer Cassif, for expressing support for South Africa’s proceedings before the International Court of Justice, she stated that she was “personally proud of the ruins of Gaza,” and that “every baby, even 80 years from now, will tell their grandchildren what the Jews did when their families were murdered . . .”²³²
- On 20 March 2024, she ‘tweeted’ that “[t]here is no starvation in Gaza. There are people starving for Jewish flesh and blood in Gaza”.²³³ Rebuking former MK Yael German’s call for the Israeli government to stop starving Palestinians in Gaza, she adopted the Israeli Prime Minister’s framing of the conflict, stating that “[o]nly a shadow of a person is able to empathize with the Gazan darkness, and not with the Israeli light.”²³⁴
- On 10 May 2024, she posted on X: “[t]he Palestinians wish to be like all other nations — after they murdered, raped, burned, and supported the greatest slaughter of Jews since the Holocaust, and then ran to the UN and asked for recognition [as a State]. Whoever wishes to be a nation like all others must, first and foremost, be a human being and not a devil in the shape of a human being. This decision reeks of misogyny and antisemitism, when in the eyes of the UN the blood of Jewish women is insignificant, and the blood of Jewish children is insignificant. In 80 years, the States of the world have learned n-o-t-h-i-n-g! We are a sovereign State with more than 3500 years of history; no antisemitic decision will move us from here and obscure our legacy and tradition. We as a people, a state, and a government will know how to deal with this folly. UN-REAL!”²³⁵
- On 7 June 2024, in response to the UN Secretary-General’s listing of Israel as a State, *inter alia*, killing and maiming children in armed conflict, she commented that “[t]he UN probably doesn’t understand the language of the Middle East and what we are faced with. And so the answer to the world and to our fighters is one: ‘A thousand mothers of terrorists will cry, [so that] my mother will not cry’”.²³⁶
- On 25 June 2024, she ‘tweeted’: “It’s time to bust the myth of the ‘uninvolved’!” and attached a long speech from the dais in the Knesset, in which she addressed her fellow MKs and Palestinians in Gaza, stating: “And this is the place to address you, the residents of Rimal, Shujaiyah, Zeitoun, Rafah, Khan Younis and the surrounding area. Listen carefully, and I know you’re listening . . . Our fighters will reach every house, classroom or hospital. And I truly recommend you, truly. . . you should draw up a will for your one poor miserable donkey,

²³⁰ Moriya Asraf Wolber, “Ministers In Cabinet Meeting: ‘This Is An Intelligence [Directorate] Failure; What Happened Here?’”, *13 TV* (7 October 2023), <https://13tv.co.il/item/news/politics/k6d6k-903737400/>.

²³¹ May Golan, @GolanMay, Tweet (11:30 am, 9 November 2023), <https://x.com/GolanMay/status/1722547293813981248>.

²³² May Golan, @maygolan8, Instagram post (19 February 2024), <https://www.instagram.com/maygolan8/p/C3icmGuoG8z/>. Also available at Middle East Eye, @MiddleEastEye, Tweet (8:14 am, 22 February 2024), <https://twitter.com/MiddleEastEye/status/1760548502348701804>.

²³³ May Golan, @GolanMay, Tweet (6:33 pm, 20 March 2024), <https://twitter.com/GolanMay/status/1770504012523045031>.

²³⁴ *Ibid.*

²³⁵ May Golan, @GolanMay, Tweet (5:57 pm, 10 May 2024), <https://x.com/GolanMay/status/1788961675401462265>.

²³⁶ May Golan, @GolanMay, Tweet (6:19 pm, 7 June 2024), <https://x.com/GolanMay/status/1799113938505773408>.

who you are also abusing as well . . . Every so-called innocent ‘resident’ of Gaza who helps Hamas is a terrorist, even if he has an UNRWA vest or an Al-Jazeera microphone in his closet . . . This nation does not believe the voices of those protesting on your behalf, explaining that you are poor innocent civilians. Why? Because to this day, we haven’t seen even one righteous civilian who pointed out the location of tunnels and shafts, terrorists or hostages, in order to save the lives of his family and his people . . . And this begs the question, why hasn’t there been a single person of that kind? And the answer is simple — there’s no such thing as uninvolved civilians. The left has brainwashed all of us into thinking that a bereaved Israeli mother and the mother of a Palestinian Shahid [martyr] experience the same pain . . . And to you, heroic and sacred IDF fighters, I say clearly: No Hague, no UN, no nothing. [In Arabic] Let 1,000 Arab moms of terrorists weep so that a single Israeli mom does not weep. [In Hebrew] You, our heroes, should do anything to protect your lives and the lives of your brothers in arms. Your lives are more important than a thousand court rulings and boycotts of The Hague. . . ”²³⁷

Israeli Minister of Housing and Construction, Yitzhak Goldknopf

24. MK Yitzhak Goldknopf is the leader of the United Torah Judaism party and Minister of Housing and Construction.

- On 23 May 2024, he repeated the dehumanising language of other senior Israeli officials. In response to the announcement of the impending recognition of the State of Palestine by Ireland, Norway and Spain, and subsequent to the release of a video of Israeli hostages, he ‘tweeted’: “Brutal terrorism must be destroyed and certainly not given independent rule. We have no desire to rule over the residents of Gaza, but we also have no ability to live alongside a state of human animals.”²³⁸
- On 6 October 2024, he ‘tweeted’ on X in support of his directive evicting UNRWA from its Jerusalem premises: ²³⁹ “We prefer that the terrorist organization UNRWA will be in danger, over the possibility that the people of Israel will be in danger. Following my instruction to evacuate UNRWA from the State [of Israel], we will do everything to remove the terrorist organization and its members from the area of the State of Israel.”²⁴⁰
- On 28 November 2024, the Minister announced that he had inspected sites in the Gaza Strip where he wants to reestablish settlements, ‘tweeting’ “I toured the Gaza Strip settlements today. The Jewish settlement here is the answer to the terrible massacre and the answer to the International Criminal Court in The Hague who chose to issue orders against the Prime Minister and the Minister of Defense instead of caring for the 101 hostages”.²⁴¹

²³⁷ May Golan, @GolanMay, Tweet (6:47 pm, 25 June 2024), <https://x.com/GolanMay/status/1805643943541195157>.

²³⁸ Yitzhak Issachar Goldknopf, @DOVRUTGoldknopf, Tweet (4:30 pm, 23 May 2024), <https://x.com/DOVRUTGoldknopf/status/1793650649919611107>.

²³⁹ Minister for Housing and Construction, @DOVRUTGoldknopf, Tweet (2:25 pm, 10 October 2024), <https://x.com/DOVRUTGoldknopf/status/1844353671578194361>.

²⁴⁰ Yitzhak Goldknopf, @DOVRUTGoldknopf, Tweet (1:30 pm, 6 October 2024), <https://x.com/DOVRUTGoldknopf/status/1842890124046053479>.

²⁴¹ Sam Sokol, “Minister Goldknopf inspects Gaza with settler leader, urges settlement of Strip, poses with map of planned settlements”, *The Times of Israel* (28 November 2024), https://www.timesofisrael.com/liveblog_entry/gazing-at-gaza-through-binoculars-minister-goldknopf-poses-with-map-of-planned-settlements/; Yitzhak Goldknopf, @DOVRUTGoldknopf, Tweet (1:18 pm, 28 November 2024), <https://x.com/DOVRUTGoldknopf/status/1862108903565033971>.

Israeli Minister of Communications, Shlomo Karhi

25. Minister of Communications and Likud MK, Shlomo Karhi, stated — in response to the possibility of a company (Starlink) ensuring internet connectivity in Gaza for “internationally recognized aid organizations”²⁴² — that “Israel will use all means at its disposal to fight this” and that his “office will cut any ties with [S]tarlink.”²⁴³ On 17 October 2023, his Ministry also published that “[T]here is an ongoing examination and preparation for the shutting down of cellular communications and Internet services to Gaza.”²⁴⁴ He has also shut down news outlets reporting on the situation in Gaza: in May, he ordered Al Jazeera — “one of the few international news outlets that has remained in Gaza throughout the war, broadcasting scenes of airstrikes and overcrowded hospitals”²⁴⁵ — to shut down in Israel, including preventing its broadcasts and confiscating its equipment.²⁴⁶ He has also ordered the confiscation of Associated Press (‘AP’) news equipment for its live feed showing a view into northern Gaza, on the alleged basis that it shares images with Al Jazeera,²⁴⁷ labelling AP “a freelancer for a terrorism media channel that endangers our fighters and broadcast our forces’ positions to them using your camera”.²⁴⁸ The Minister later reversed his decision on AP — but not Al Jazeera — following widespread condemnation.²⁴⁹ He has made the following dehumanising, inciting, and genocidal statements, including to his over 75,000 followers on X:

- On 8 January 2024, he gave an interview on Knesset TV in which he said “[w]e certainly need to encourage emigration, so that there’s as little pressure as possible inside the Gaza Strip from people who, yes, at the moment they’re uninvolved but they’re not exactly lovers of Israel and they educate their children to [embrace] terror. And we’d like to see — and we’ve talked about this in government meetings. By the way, there aren’t any countries that want to take them in. No one wants them, even if we pay a lot of money. Voluntary emigration is important. It doesn’t in any way harm human rights . . . we should encourage voluntary migration, and ‘we should compel them until they say they want it’.” Upon the interviewer’s question as to “[h]ow”? He said: “The war does what it does.”²⁵⁰
- On 28 January 2024, he ‘tweeted’ his speech at the so-called ‘Gaza resettlement’ conference, organised by a settler organisation, together with a statement to his

²⁴² Elon Musk, @elonmusk, Tweet (1:12 pm, 28 October 2023), <https://x.com/elonmusk/status/1718224153474388433>. See also Yuval Mann, “Musk says his Starlink will connect UN and aid organizations in Gaza to Internet”, *Ynet* (29 October 2023), <https://www.ynetnews.com/article/rk2hwsfsm>.

²⁴³ Shlomo Karhi, @shlomo_karhi, Tweet (6:53 pm, 28 October 2023), https://x.com/shlomo_karhi/status/1718309963666211328.

²⁴⁴ Israeli Ministry of Communications, *Summary of the activities of the Ministry of Communications – ten days into the war* (23 October 2023), available at: <https://www.gov.il/en/pages/17102023>.

²⁴⁵ “Israeli officials seize AP equipment and take down live shot of northern Gaza, citing new media law”, *The Associated Press* (21 May 2024), <https://www.ap.org/media-center/ap-in-the-news/2024/israeli-officials-seize-ap-equipment-and-take-down-live-shot-of-northern-gaza-citing-new-media-law/>.

²⁴⁶ Israel Prime Minister’s Office, *PM Netanyahu and Communications Minister Shlomo Karhi: Government Unanimously Approves Closure of Al Jazeera* (5 May 2024), <https://www.gov.il/en/pages/spoke-aj050524>.

²⁴⁷ “Israeli officials seize AP equipment and take down live shot of northern Gaza, citing new media law”, *The Associated Press* (21 May 2024), <https://www.ap.org/media-center/ap-in-the-news/2024/israeli-officials-seize-ap-equipment-and-take-down-live-shot-of-northern-gaza-citing-new-media-law/>.

²⁴⁸ Shlomo Karhi, @shlomo_karhi, Tweet (4:35 pm, 21 May 2024), https://x.com/shlomo_karhi/status/1792927133032939706.

²⁴⁹ Shlomo Karhi, @shlomo_karhi, Tweet (9:06 pm, 21 May 2024), https://x.com/shlomo_karhi/status/1792995335721136332: “The Ministry of Communication acted in accordance with security assessments and the government’s decision. However, the Ministry of Defense asked to re-examine the matter of broadcasts from sensitive locations and their effect risking our forces. In light of this, the Minister of Communications ordered to return the equipment to the AP Agency at this stage, until a security assessment is received and the issue is examined again.”

²⁵⁰ “A brilliant move of the Prime Minister - Minister of Communications, Shlomo Karai, on the election of Aharon Barak as judge”, *Knesset TV* (8 January 2024), <https://www.youtube.com/watch?v=xSx8iTUjM0M>; also available at Muhammad Shehada, @muhammadshehad2, Tweet (3:27 pm, 10 January 2024), <https://x.com/muhammadshehad2/status/1745074895145357597>.

followers. In it he called for the “voluntary migration” of Palestinian civilians, stating that in war, “‘voluntary’ is at times a state you impose [on someone] until they give their consent.”²⁵¹ He also called for the Israeli army to “[k]eep going until victory!”, stating that “everything that our God bequeathed unto us, we shall inherit. . . Gaza and its daughters.”²⁵² A longer excerpt of his statement includes:

“ . . . We are here to say tonight: There will be no Palestinian state, ever! Between the river and the sea. We will not allow a terrorist Authority to control Gaza. To Yahya Sinwar and his terrorists who rose against us to destroy us, we say just before their end: ‘Whatever your god of terror will bequeath unto you is what you will inherit, and that will be physical and ideological death, and everything that our God bequeathed unto us, we shall inherit. . . Gaza and its daughters.

We have an obligation to advocate, for our own sake and even for the sake of Gaza’s residents, for voluntary emigration. Even though this war which was imposed upon us turns the situation into a kind of ‘coerce him until he says: I want to’ [Yevamot 106a]. Lest we reach a scenario of ‘if you do not dispossess the inhabitants of the land, those whom you allow to remain shall be stings in your eyes and thorns in your sides, and they shall harass you’ [Numbers 33:55]. But ‘I will drive them out before you little by little, until you have increased and possess the land’ [Exodus 23:30].

To preserve the military gains for which so many of our fighters sacrificed their lives, we must settle Gaza with security forces and settlers who will envelop them and this land with love. That is the spirit of the people. The spirit is unstoppable.

Not because we have no choice, but out of a deep understanding that this is the only true way, both to make the Nazis from Hamas pay a heavy price, and to protect our people and our homeland. We will wipe out the disgrace of the night of Tisha B'av 5655 [Jewish date for August 14, 2005] — the terrible expulsion from Gush Katif.

G-d willing, we will increase the unity within our people, even with our brothers who oppose this important conference here. We will back up and protect our heroic fighters, we will bring our hostages back home alive and well, we will destroy the enemy and stop the threat to Israel in the north, the south and in Judea and Samaria. To next year in the rebuilt Gaza.”²⁵³

- On 29 January 2024, he asserted on X, in response to the ICJ’s Provisional Measures Order of 26 January 2024, that Israel “ . . . must ensure we are not tying the hands of the IDF soldiers, or God forbid, endangering them out of fear of what the world will say.”²⁵⁴
- On 28 April 2024, in a ‘tweet’, he issued a call to genocide, referring to all Palestinians in Gaza as “the best of snakes” and calling for the crushing of their skulls. Quoting a Talmudic excerpt, the Minister stated:

“[T]he best among snakes — thou shall crush their skulls (Midrash Tanhuma, Talmud). In these days, when our enemies threaten to destroy us, and [as they] challenge our right to live here in the State of Israel, our

²⁵¹ Nir Hasson and Rachel Fink, “Netanyahu Ministers Join Thousands of Israelis in ‘Resettle Gaza’ Conference Calling for Palestinians’ Transfer”, *Haaretz* (28 January 2024), <https://www.haaretz.com/israel-news/2024-01-28/ty-article/ministers-from-netanyahus-party-join-thousands-of-israelis-at-resettle-gaza-conference/0000018d-512f-dfdc-a5ad-db7f35e10000>;

Shlomo Karhi, @shlomo_karhi, Tweet (8:27 pm, 28 January 2024), https://twitter.com/shlomo_karhi/status/1751703524159660123.

²⁵² Shlomo Karhi, @shlomo_karhi, Tweet (10:27 pm, 28 January 2024), https://twitter.com/shlomo_karhi/status/1751703524159660123.

²⁵³ Shlomo Karhi, @shlomo_karhi, Tweet (8:27 pm, 28 January 2024), https://twitter.com/shlomo_karhi/status/1751703524159660123.

²⁵⁴ Shlomo Karhi, @shlomo_karhi, Tweet (5:04 pm, 29 January 2024), https://twitter.com/shlomo_karhi/status/1751984756080640363.

ancestral land, we need to remember our history. It is true that the sea is not the same sea [as in the biblical story], but our enemies' goal remains the same: to throw our children and us into the sea. Chazal [Jewish sages of the Mishnaic and Talmudic era] called them 'the best of snakes' and we know them as 'the uninvolved [civilians]'.²⁵⁵ . . . We've learned not to trust any of them. [We must] enter Rafah and cleanse it of all remnants of human scum[,] Hamas terrorists and all the weapons there. If you keep the best of the snakes alive, at least make sure it don't have any venom left to bite. The words of King David, recited at the reading at the end of the holiday, will accompany our heroic warriors in battle: 'I shall pursue my enemies and destroy them, and I shall not return until they are destroyed [2 Samuel 22:39]'.²⁵⁶

- On 14 May 2024 — after the Israeli army invasion of Rafah had begun, and at a rally for Israeli settlement of Gaza — he repeated his calls for settlement: “. . . We are here to say, we have been here for 76 years with sole independence and sovereignty for Israel over this land, and so it will be for the next 76 years, G-d willing. It is all ours. There will be no Palestinian state, ever, between the sea and the Jordan River. We will not reward terrorism. To Yahya Sinwar and all the sub-humans who have risen to annihilate us, we will say, a moment before their end, thou shall inherit that which your god of terror and murder giveth thee to inherit. And that will be destruction and death by the hands of our heroic fighters. All that your god gives you to possess, 'So we will hold on to everything that our God has given us to possess' [Judges 11:24], and that is Gaza and its daughters. This is a divine promise to the eternal nation: 'I will drive them out before you little by little, until you have increased and possess the land' [Exodus 23:30]”.²⁵⁷
- On 20 May 2024, he re-iterated in an interview on Israeli state-owned Channel Kann 11 his call for the settlement of Gaza, saying: “[F]or me, the alternative is Jewish settlement. We abandoned our land 20 years ago and the time has come to rectify this disgrace.”²⁵⁸
- On 3 July 2024, he 'tweeted': “The Supreme Court is debating whether to allow the Nazi Gazans entrance to Israel. The Attorney General opposes the law to remove terrorism from universities. Our fighters face Hamas terrorists with tied hands because of baseless legal guidelines. And there are more preposterous examples from the recent period alone. Have we gone mad!? The State Attorney at the head of this rotten system must be fired.”²⁵⁹
- On 26 July 2024, he commented on Israeli Court proceedings regarding the provision of aid in Gaza: “At the beginning of the week we witnessed a shameful show, inciting anger and pain, at the Supreme Court hall. A discussion that dealt with the well-being of the residents of the Gaza Strip, those 'uninvolved', who danced on our blood and the bodies of our martyrs. The judge listened attentively to the prosecutor who blamed the State of Israel and the IDF soldiers and the 'occupation' for the condition of the residents of the Gaza Strip . . . But thank God, towards the end of the week another refreshing breeze entered our area. . . Prime Minister Netanyahu stood and delivered a historic speech. . . in

²⁵⁵ He later made clear this refers to all Palestinian residents: Shlomo Karhi, @shlomo_karhi, Tweet (1:40 pm, 26 July 2024), https://x.com/shlomo_karhi/status/1816800855330308219.

²⁵⁶ Shlomo Karhi, @shlomo_karhi, Tweet (12:16 pm, 28 April 2024), https://x.com/shlomo_karhi/status/1784527214496662015. For a translation of 2 Samuel, see Sefaria, 2 *Samuel* 22:39 JNS 1985, https://www.sefaria.org/II_Samuel.22?lang=bi.

²⁵⁷ B.M., @ireallyhateyou, Tweet (9:40 pm, 29 June 2024), <https://x.com/ireallyhateyou/status/1807137133313892519>.

²⁵⁸ Kan News, @kann_news, Tweet (4:33 pm, 20 May 2024), https://x.com/kann_news/status/1792564272909766750.

²⁵⁹ Shlomo Karhi, @shlomo_karhi, Tweet (3:45 pm, 3 July 2024), https://x.com/shlomo_karhi/status/1808497206141333989.

which he unfolded before the whole world the beating heart of the people of Israel. . . the spirit of the absolute victory of good over evil.”²⁶⁰

Israeli Minister of Tourism, Haim Katz

26. Minister of Tourism, Haim Katz, and a member of the Prime Minister’s Likud party, has made the following statements constituting incitement to genocide against Palestinians and demonstrating genocidal intent:

- On the evening of 7 October 2023, during a cabinet meeting of Ministers of the Israeli Government, he reportedly dismissed concerns about Israel’s Public Relations strategy, and stated “[w]e don’t need ‘Hasbara’ and we don’t need anything. We need to strike a blow [the likes of which] hasn’t been seen in 50 years and take down Gaza, otherwise we won’t survive.”²⁶¹
- On 28 January 2024, at the so-called ‘Gaza resettlement’ conference, he stated: “Today, after 18 years [from disengagement from Gaza], we have the opportunity to rebuild and expand the land of Israel. This is our final opportunity.”²⁶²

Israeli Minister of Education, Yoav Kisch

27. Yoav Kisch, member of the Prime Minister’s Likud party and Minister of Education, the Ministry “responsible for educational institutions, including kindergartens, schools, higher education and non-formal education”, whose “activities focus on legislation and planning education services” and “licensing professionals in the field of education and teaching”,²⁶³ has made the following dehumanising and inciting statements, and statements evidencing genocidal intent:

- On 8 November 2023, he said, in an interview on Israeli Army Radio, that Israel “can certainly bring back settlement and change the lines”, that “there is no status quo and nothing is sacred”, and that “everything that needs to be done, will be done to make it clear that there will be no threat against the State of Israel from the Gaza Strip.”²⁶⁴
- On 10 October 2024 he confirmed the Government’s conditions of life policy as well as a policy to visit total destruction on Gaza, and the Israeli Government’s corresponding instructions to the Israeli military, on Israeli Army Radio:

“Even, whatever, people once talked about an ecological sanitary disaster – it is irrelevant [literally: it isn’t interesting]. There will be no water, there will be no electricity in Gaza, I recommend the residents of Gaza simply head south to Egypt, which is probably the only place that won’t be attacked, all of Gaza as far as we’re concerned. . .”

Interviewer: “Is that your call to Gazan civilians who are not involved in terrorism, take your stuff and go to Egypt?”

Kisch: “I’m saying unequivocally, nothing is safe. All gas stations, all government institutions, nothing will remain in Gaza. Gaza will be changed . . . At least right now I know that the crossing is open, and

²⁶⁰ Shlomo Karhi, @shlomo_karhi, Tweet (1:40 pm, 26 July 2024), https://x.com/shlomo_karhi/status/1816800855330308219.

²⁶¹ “Confrontations At The Cabinet Meeting: ‘We Need To Be Brutal’”, *Kan News* (7 October 2023), <https://www.kan.org.il/content/kan-news/politic/559622/>.

²⁶² Nir Hasson and Rachel Fink, “Netanyahu Ministers Join Thousands of Israelis in ‘Resettle Gaza’ Conference Calling for Palestinians’ Transfer”, *Haaretz* (28 January 2024), <https://www.haaretz.com/israel-news/2024-01-28/ty-article/ministers-from-netanyahus-party-join-thousands-of-israelis-at-resettle-gaza-conference/0000018d-512f-dfdc-a5ad-db7f35e10000>.

²⁶³ Government of Israel, *Ministry of Education*, https://www.gov.il/en/departments/ministry_of_education/govil-landing-page.

²⁶⁴ Amir Tibon and Yehonatan Liss, “Minister Kisch: We Can Certainly Restore Settlement In The Strip, Nothing Is Sacred”, *Haaretz* (8 November 2023), <https://www.haaretz.co.il/news/politi/2023-11-08/ty-article/premium/0000018b-af37-dedf-adab-ef376af10000>.

therefore the residents of Gaza, civilians who are not involved in terrorism... these people, I'm not that concerned about it, that will be the only place they can exit to. All of Gaza is a target to any governmental activity . . . Gaza will not remain — not even similar to the event of after [military] operations and such things. This event is different. You have to understand that. I don't know, that is the message the army received from the Cabinet... the military understands it, I can't tell you yet what Gazans understand, but that's the message."²⁶⁵

Israeli Minister of Heritage (until 19 January 2025), Amichai Eliyahu

28. Israel's Minister of Heritage until 19 January 2025, and member of the Otzma Yehudit party, Amichai Eliyahu, lives in the illegal Israeli settlement of Rimonim in the occupied Palestinian territory.²⁶⁶ Since 7 October 2023 he has issued numerous statements, including on Facebook and in media interviews, that are genocidal and incite to genocide:

- On 1 November 2023, he posted footage of an electricity pole being bulldozed in Gaza on Facebook, titling this video with "North of the Gaza Strip, more beautiful than ever. We bomb and flatten everything, a pleasure to see this. (a soldier in Gaza)". He stated: "We must speak about the day after. My vision is that we will give plots of land to each person that fought in Gaza throughout the years and to those that were expelled from Gush Katif [a former Israeli settlement] — with the help of God. (without safe spaces)."²⁶⁷
- On 3 November 2023, he posted on Facebook: "Destroy an entire city? God Almighty taught our Father Abraham that even though the people of Sodom were bad and sinful, the decision to kill them was made after they heard the cry of the raped girl, and it wasn't reciprocated with mercy [See Genesis 19]. There is a patience for evil that at a certain moment needs to stop. The so-called paradigm [literally: conception] that you can live side by side next to terrorism; next to the 'non-involved' who entered in flip-flops to rape, slaughter and loot, or the thought of giving control back to the PA is against human morality and threatens the well-being of Israeli citizens. I have no joy over the deaths of innocent people, but wars have painful prices. 70,000 civilians were killed in the Luftwaffe bombings in England, 2 million Germans were killed in the British Air Force bombings in Dresden, Assen, Cologne, and Leipzig. The annihilation of evil has prices and if you want to save humanity from their terrible harm you need to act, even if some in the world still don't understand it."²⁶⁸

²⁶⁵ Yanir Cozin and Sefi Ovadia, *GLGLZ* (10 October 2023), <https://glz.co.il/%D7%92%D7%9C%D7%A6/%D7%AA%D7%95%D7%9B%D7%A0%D7%99%D7%95%D7%AA/%D7%99%D7%A0%D7%99%D7%A8-%D7%A7%D7%95%D7%96%D7%99%D7%9F-%D7%95%D7%A1%D7%A4%D7%99-%D7%A2%D7%95%D7%91%D7%93%D7%99%D7%94/%D7%99%D7%A0%D7%99%D7%A8-%D7%A7%D7%95%D7%96%D7%99%D7%9F-%D7%95%D7%A1%D7%A4%D7%99-%D7%A2%D7%95%D7%91%D7%93%D7%99%D7%9410-10-2023-0801>, [around 01:25:00].

²⁶⁶ Ido Ben Porat, "Rabbi Amichai Eliyahu joins Otzma Yehudit", *Israel National News* (21 August 2022), <https://www.israelnationalnews.com/news/358520>.

²⁶⁷ Amichai Eliyahu, Facebook (1 November 2023), <https://www.facebook.com/eliyau.a/videos/148918588283326/>.

²⁶⁸ Amichai Eliyahu, Facebook (3 November 2023) <https://www.facebook.com/eliyau.a/posts/pfbid0hpckjE7Hc4W9gPohx8c5SscsueD2BZYqGDtsWsGXXKsprW29Tsgxt3jJQvYJgnWtl>.

- On 5 November 2023, he suggested in a radio interview that a nuclear attack on the Gaza Strip was an option.²⁶⁹ When asked whether he was suggesting that a bomb might be dropped on Gaza, he responded saying, “[t]hat’s one of the possibilities”.²⁷⁰ His call echoed that of Tally Gotliv MK on 9 October 2023, urging Israeli forces to employ “[t]he doomsday weapon!”.²⁷¹ In that same radio interview, he argued that humanitarian aid should not be permitted into Gaza, stating they “wouldn’t grant the Nazis humanitarian aid. There is no such thing as uninvolved [civilians] in Gaza”.²⁷²
- On 30 January 2024, in an interview broadcast on Israeli Army Radio, he called for “all the humanitarian aid” to Gaza to be “[a]ctually stop[ped]”.²⁷³
- On 20 March 2024, in an interview with a United States news agency, he stated that it would be “immoral” not to pursue settlement in Gaza, describing “Jewish settlement” as being dictated by “[t]he language of the land” and “security” considerations.²⁷⁴
- On 29 July 2024, the Minister was recorded protesting at the base where soldiers being investigated for raping a Palestinian detainee were temporarily held, chanting “Death to Terrorists”,²⁷⁵ demonstrating against any enforcement action against the soldiers responsible for the rape.²⁷⁶ He also posted a video of himself *en route* to the military base where the Israeli soldiers suspected of the rape were being detained, in which he implored “all the House [political] parties” to “go down and fight to change this judicial madness” and to “back up these virtuous reservists, who are [positioned] there, in this impossible fighting, in front of these human animals, get there and back them up” and who “are guarding the most savage people, the Palestinian Nazis”.²⁷⁷
- On 19 December 2024, speaking from his visit with settlement leaders to next to the Netzarim Corridor, the Minister commented: “I see in my mind the State of Israel giving land and houses on Gaza’s beachfront to everyone who took part

²⁶⁹ Gili Cohen, Dov Gil-Har, Itay Blumenthal and Sulieman Masvidan, “Minister Amichai Eliyahu: Atomic bomb on Gaza? This is one of the possibilities”, *Kan* (5 November 2023), <https://www.kan.org.il/content/kan-news/politic/596470/>. Also available at “Far-right minister: Nuking Gaza is an option, population should ‘go to Ireland or deserts’”, *The Times of Israel* (5 November 2023), https://www.timesofisrael.com/liveblog_entry/far-right-minister-nuking-gaza-is-an-option-population-should-go-to-ireland-or-deserts/; The radio comment was criticised by the Prime Minister. Prime Minister of Israel, @IsraeliPM, Tweet (8:05 am, 5 November 2023), <https://twitter.com/IsraeliPM/status/1721076229518823826>. The Prime Minister’s Office announced that the MK had been suspended from government meetings until further notice, although he reportedly voted in a meeting later that day. No clause allowing for suspension — or giving it consequence with respect to government meeting presence or voting — exists. Moran Azoulay, “Netanyahu ‘suspended’ the minister who did not rule out a nuclear bomb on Gaza — although government regulations allow no such option”, *Ynet* (5 November 2023), <https://www.ynet.co.il/news/article/rjdl5ebm6>.

²⁷⁰ Gili Cohen, Dov Gil-Har, Itay Blumenthal and Sulieman Masvidan, “Minister Amichai Eliyahu: Atomic bomb on Gaza? This is one of the possibilities”, *Kan* (5 November 2023), <https://www.kan.org.il/content/kan-news/politic/596470/>.

²⁷¹ MK Revital Gotliv, @TallyGotliv, Tweet (5:59 pm, 9 October 2023), <https://twitter.com/TallyGotliv/status/1711426284322996613>.

²⁷² Gili Cohen, Dov Gil-Har, Itay Blumenthal and Sulieman Masvidan, “Minister Amichai Eliyahu: Atomic bomb on Gaza? This is one of the possibilities”, *Kan* (5 November 2023), <https://www.kan.org.il/content/kan-news/politic/596470/>. Also available in “Far-right minister: Nuking Gaza is an option, population should ‘go to Ireland or deserts’”, *The Times of Israel* (5 November 2023), https://www.timesofisrael.com/liveblog_entry/far-right-minister-nuking-gaza-is-an-option-population-should-go-to-ireland-or-deserts/.

²⁷³ “Minister Amichai Eliyahu: ‘We see how the conception put us in a coma’”, *Now 14* (30 January 2024), <https://www.youtube.com/watch?v=XFqe43jFJR8>.

²⁷⁴ “‘That sounds like ethnic cleansing’: CNN questions lead figure in Israel’s settler movement”, *CNN* (20 March 2024), <https://www.youtube.com/watch?v=FkXJwErm8DM> [6:12].

²⁷⁵ “The Netanyahu State Has Lost Control of Israel’s Extreme Right”, *Haaretz* (30 July 2024), <https://www.haaretz.com/opinion/editorial/2024-07-30/ty-article-opinion/the-netanyahu-state-has-lost-control-of-israels-extreme-right/00000191-000d-d76c-abf3-d26fa1c80000>.

²⁷⁶ *Ibid.* See also Documentary violence and war crimes, @arixegal, Tweet (11:24 pm, 29 July 2024), <https://x.com/arixegal/status/1818019713823485968>.

²⁷⁷ Amichay Eliyahu, @Eliyahu_a, Tweet (1:39 pm, 29 July 2024), https://x.com/eliyahu_a/status/1817887759240962117.

in the people of Israel's revival from under their enemies . . . A Jewish Gaza is ours, just as Haifa, Tel Aviv, and Jerusalem are ours. We will return there!"²⁷⁸

Israeli Minister of Diaspora Affairs, Amichai Chikli

29. Minister of Diaspora Affairs and Combatting Antisemitism, Likud MK Amichai Chikli, has also called for Israeli settlements in Gaza, stating: "I, ideally, would prefer that the northern region of the Strip will, until further notice, be an unpopulated area. And that we thoroughly deal with all the infrastructure there. This is also the area closest to our population centers, to our sensitive [military] facilities, we can't afford to have Hamas retake this area, and we know Hamas needs population in order to operate from within it, and I also think it's right to [inflict] a price, a territorial price, upon them, at this stage, in the form of the buffer zone [along the Gaza fence]. And I wouldn't object seeing tractors plowing the fields of Khirbet Ekhze'a [Hebrew name for Khuza'a]. I think there is poetic justice in that, and it's one of the pictures I liked the most [from] the war."²⁷⁹

Israeli Minister of Settlements and National Missions, Orit Strock

30. Minister for Settlements and National Missions, MK Orit Strock, is a member of the National Religious Party–Religious Zionism Party in Benjamin Netanyahu's coalition government. She lives in an illegal Israeli settlement in Hebron in the occupied Palestinian territory.²⁸⁰ Statements she has made which dehumanise Palestinians, are genocidal and incite genocide, include the following:

- On 19 February 2024, she stated that ". . . there is no such thing as the Palestinian people, there is no such nation . . . Every person of culture in the world knows that we were exiled from [this country] ... and our enemies and haters knew too that we will come back to it because it is ours, ours only, and we belong to it, solely to it . . ."²⁸¹
- On 19 March 2024, she returned to her often-repeated theme of denying the existence of Palestinians as a distinct racial, ethnical or national group, stating: "[T]here is no Palestinian people. There is no such thing. All these thoughts, never mind, even before the security threat, there is no Palestinian people. This land is the land of the People of Israel, including the Gaza strip, including Samaria, certainly including the Galilee that we have to fight for, this land is our own land and we need to rule it. I think we should bring back into the discourse the idea which the Lobby [For The Land Of Israel] has stuck with over years, of establishing our sovereignty in our land, there is no place for another sovereign here! Only ours, not only in the security aspect, in every aspect."²⁸²

²⁷⁸ Amichay Eliyahu, @Eliyahu_a, Tweet (11:06 am, 19 December 2024), https://x.com/Eliyahu_a/status/1869700778455437680; "Ben-Gvir: IDF must stay in Netzarim Corridor", *JNS* (20 December 2024), <https://www.jns.org/ben-gvir-idf-must-stay-in-netzarim-corridor/>.

²⁷⁹ Younis Tirawi, @ytirawi, (12:54 am, 12 July 2024), <https://x.com/ytirawi/status/1811519392577962254>.

²⁸⁰ Israel, The Knesset, *Members of the 25th Knesset: Knesset Member Orit Strock*, <https://m.knesset.gov.il/mk/pages/mkpersonaldetails.aspx?mkid=884>.

²⁸¹ Paz Abuhatzirah, "Minister Strock: 'The land of Israel is all ours and we belong to it, there is no such thing as a Palestinian people' — Watch", *0404* (19 February 2024), <https://www.0404.co.il/?p=961946>; video also available at Middle East Eye, @middleeasteye, Instagram (21 February 2024), <https://www.instagram.com/middleeasteye/reel/C3nVhdCIDVU/>.

²⁸² "The lobby for the land of Israel", *Knesset TV* (19 March 2024), <https://www.knesset.tv/committees/conventions/video/65145/> at [-1:13:10 to -1:12:16]; video also available at Middle East Eye, @middleeasteye, Instagram (26 March 2024), <https://www.instagram.com/reel/C4-dF50rJ7c/>.

- On 31 May 2024, she ‘tweeted’ that victory meant fertile fields for Israeli farmers “to the ruins of Gaza,”²⁸³ expressly linking the Israeli settlement of Gaza to the destruction of Gaza and its people.

**Deputy Speaker of the Knesset and Member of the Foreign Affairs
and Security Committee Nissim Vaturi**

31. The Deputy Speaker of the Knesset Likud MK Nissim Vaturi, constitutionally responsible for assisting the speaker of the Knesset in their role or serve as acting speaker in the absence of the Speaker of the Knesset,²⁸⁴ routinely permits and engages in genocidal rhetoric, including in the Knesset itself and online on X. By way of example:

- On 7 October 2023, he ‘tweeted’ that “Now we set aside all disagreements. I have a lot to say, but there will be enough time for self-criticism and soul-searching regarding everything that preceded the catastrophe this morning. Now we all share one goal: erasing the Gaza Strip off the face of the Earth. Whoever is not capable of it will be replaced. Sending condolences to the families and wishes of recovery to the injured. Sending strength to the IDF soldiers and the security forces: the entire Nation of Israel is behind you!”²⁸⁵
- On 9 October 2023, he incited genocide in Gaza, ‘tweeting’: “Erase Gaza. Nothing else will satisfy us. It is unacceptable that we maintain a terrorist authority right next to Israel. Do not leave a [single] child there[,] exile anyone who remains there in the end, so they will have no revival.”²⁸⁶ His post had over one million views.²⁸⁷
- On 5 November 2023, on Israeli radio station 93fm — in response to the interviewer’s question that “[a]nd if I return to [the subject of] Gaza, judging by the sentences you said and didn’t say, you want to encourage some kind of transfer there? Get out of here, go away, spread around the world?” — he stated: “A very positive transfer, of course. The 10-year-old of today is the terrorist of tomorrow. We need a transfer, and if there will be a minority that will stay, let them be a municipal authority at best. . . Right, we need to evacuate all the despicable people from there. The 10-year-old boy there now, that’s the boy who will murder our boy a few years from now. This story will never end. You understand? You don’t keep the seed of Amalek alive; you need to kill every one of them. So, you know what, if they don’t want to kill kids, throw them out of here. Let ships come, like it was in Lebanon with Arafat, and kick them out of here.”²⁸⁸ With respect to a ceasefire he stated: “They see us as subservient, and this [is something] the Arabs don’t understand, it’s not Arab language, [it’s like] we’re talking to them in Polish. We need to talk to them in Arabic. When you talk to them in Arabic, to make them understand, we are choking you, so we choke them now. It’s not like you’re holding a piece of iron and then you tell them, take a sandwich, we will take care of you later. No. We need to choke

²⁸³ Minister of Settlements and National Missions of Israel, Orit Strock, @oritstrock, Tweet (2:35 pm, 31 May 2024), <https://x.com/oritstrock/status/1796520870732849474>.

²⁸⁴ Israel, *Basic Law: The Knesset* (1958), https://www.gov.il/apps/elections/elections-knesset-19/eng/law/BasicLawKnesset_eng.html (unofficial translation).

²⁸⁵ MK Nissim Vaturi, @nissimv, Tweet (6:33 pm, 7 October 2023), <https://twitter.com/nissimv/status/1710694866009596169>. Also available in part in “Public Statement: Scholars Warn of Potential Genocide in Gaza”, *Opinio Juris* (18 October 2023), <https://opiniojuris.org/2023/10/18/public-statement-scholars-warn-of-potential-genocide-in-gaza/>.

²⁸⁶ MK Nissim Vaturi, @nissimv, Tweet (8:04 am, 9 October 2023), <https://x.com/nissimv/status/1711261388809568458>.

²⁸⁷ *Ibid.*

²⁸⁸ “Vaturi: ‘Giving the Gaza Strip to the Palestinian Authority — This is Oslo 2’”, *93fm* (5 November 2023), <https://www.93fm.co.il/radio/954562/> [5:05-09:02].

them. They need to understand that we are angry, we want to kill you now, we don't give them medicine and sandwiches.”²⁸⁹

- On 14 November 2023, he ‘tweeted’ along with a video clip of an interview with an Israeli media outlet, “Returning to Jewish settlement in the north of the Gaza Strip is a correct and logical answer to Hamas’s murderous terror attack! Settlement will help restore security and affix the Israeli victory image in our enemies’ eyes”.²⁹⁰
- On 17 November 2023, he ‘tweeted’, “all the fuss about whether there is or isn’t internet in Gaza shows we’ve learned nothing. We are too humane — burn Gaza now, no less”²⁹¹ and “Don’t bring in fuel, don’t bring in water until the captives return!”.²⁹²
- On 18 November 2024, having been temporarily blocked on X for his tweet calling to “burn Gaza”,²⁹³ he stated in a subsequent interview to Channel 12, “I say, yes, we will burn Gaza. There are a hundred thousand people, of whom the vast majority of those who remain there are terrorists. I don’t think it’s something that someone should be blocked [for on X]. I didn’t say to burn children the way they burned them.”²⁹⁴
- On 20 November 2023, another Israeli radio station, Radio 103 FM, reported Nissim Vaturi’s defence of his ‘tweet’, stating: “I said burn Gaza, why should we be ashamed? Are there civilians in Gaza? Suddenly [we] bring in fuel to the Strip, [they] murdered children, why should we put up with something like that? What’s left in Gaza? Tunnels, Hamas, and the damned terrorists who are holding [Israeli] children hostage.”²⁹⁵
- On 27 December 2023, the Deputy Speaker stated: “[T]hey are telling us that there are uninvolved [people in Gaza]. We saw all those who went into the Kibbutzim, pulled and ripped kids, and kidnapped [them]. All of them were involved in everything that happened. It’s time that the people of Israel act like the people of Israel. Simeon and Levi²⁹⁶ — that’s the way. And we need to continue until the end, so that next time no one will think [about it even] a thousand times and will still not do something like this. What they did — won’t happen again. And it won’t recur only if we do one thing — if we’ll destroy them completely.”²⁹⁷
- On 10 January 2024 — the day before the oral hearing on South Africa’s first Request for Provisional Measures — he emphasised his call to genocide in an interview with Israeli radio station Kol Barama Radio, stating:

“I stand behind what I said . . . it is better to burn, to take down buildings, than that our soldiers should be harmed . . . I said to ‘burn Gaza.’ What does

²⁸⁹ *Ibid* [9:40 and onward].

²⁹⁰ MK Nissim Vaturi, @nissimv, Tweet (3:58 pm, 14 November 2023), <https://x.com/nissimv/status/1724426683959148893>.

²⁹¹ MK Nissim Vaturi, @nissimv, Tweet (since deleted, original link provided), <https://twitter.com/nissimv/status/1725472420058857891>; Kann News, @kannnews, Tweet (3:24 pm, 17 November 2023), https://x.com/kann_news/status/1725505189476487213.

²⁹² MK Nissim Vaturi, @nissimv, Tweet (1:48 pm, 17 November 2023), <https://x.com/nissimv/status/1725481059658186985>.

²⁹³ Ariella Marsden, “Likud MK calls to ‘burn Gaza’ in latest controversy”, *The Jerusalem Post* (20 November 2023), <https://www.jpost.com/israel-news/politics-and-diplomacy/article-774213>.

²⁹⁴ “Deputy Knesset Speaker Blocked By X For Call To ‘Burn Gaza’”, Yair Netanyahu shares posts casting blame for Oct. 7 on courts, security services”, *The Times of Israel* (19 November 2023), <https://www.timesofisrael.com/yair-netanyahu-shares-posts-casting-blame-for-oct-7-on-courts-security-services/>.

²⁹⁵ 103FM, @radio103fm, Tweet (10:44 am, 20 November 2023), <https://x.com/radio103fm/status/1726522005824864427>.

²⁹⁶ Sefaria, Genesis 34, JPS 1985, <https://www.sefaria.org/Genesis.34?lang=bi&aliyot=0>: “On the third day, when they were in pain, Simeon and Levi, two of Jacob’s sons, brothers of Dinah, took each his sword, came upon the city unmolested, and slew all the males.”

²⁹⁷ Mothers of the Combatants, Facebook (27 December 2023), <https://www.facebook.com/Mothers.Soldier/videos/297875966588921/>.

it mean to burn? To go in and rip them apart. There should be no thoughts, no considerations. The soldiers of the IDF should not think for one second and be hurt because we need to be humane. . . We evacuated them all — we succeeded in evacuating 1,900,000 in an organized fashion, and there are 100,000 left . . . I don't think that there are any innocents there now — not now, and not when I made my statement . . . I have no mercy on people like this — certainly not in times of war when our soldiers are falling to defend their homeland. We cannot be noble at home and say, 'Oy, there are innocents there.' If there is an innocent there, we know about him. Whoever is left there needs to be eliminated, period. I have no doubts about that".²⁹⁸

- On 15 May 2024, he informed the Knesset — the order of which he is supposed to keep as Deputy Speaker — that he had himself previously joined in the aid protests to actively block aid trucks going to Gaza, saying "I came and blocked the road [for aid convoys] with my vehicle as well, a month and two months ago",²⁹⁹ and urged others to do the same, saying: "If you'd stop the aid trucks, I will applaud you for this".³⁰⁰

Incitement to Genocide by Non-Cabinet Members of the Knesset

32. Israeli parliamentarians in both the opposition and the government's coalition engage in the direct and public incitement to genocide against Palestinians in Gaza. They call for Israel to "destroy all the houses" in Gaza, to "build large and wide new neighbourhoods" and to "distribute allotments to the soldiers",³⁰¹ and call for "large, extensive re-settlement" of Gaza, asserting that "[t]here is intensive work behind the scenes, for this to happen".³⁰² Politicians reiterate genocidal statements made by senior Israeli officials, including that "[t]here are no innocents in Gaza",³⁰³ that "we must not separate between the murderers of women and children and the 'citizens of Gaza' [using air quotes around this phrase]".³⁰⁴ They incite genocide against Palestinian children in particular, asserting that "the children of Gaza have brought it upon themselves!".³⁰⁵ Israeli politicians — like Israeli soldiers — call for a "Nakba that will overshadow the Nakba of 48".³⁰⁶ They also call for the blocking of humanitarian aid

²⁹⁸ "MK Vaturi: 'Burn Gaza - there are no more innocents left there'", *Israel National News* (10 January 2024), <https://www.israelnationalnews.com/news/383357>; "Ahead of Hague hearing, Likud MK doubles down on call to 'burn Gaza'", *The Times of Israel* (10 January 2024), https://www.timesofisrael.com/liveblog_entry/ahead-of-hague-hearing-likud-mk-doubles-down-on-call-to-burn-gaza/.

²⁹⁹ "The Central Stage With Mazal Mualem 15.05.2024", Knesset TV (15 May 2024), https://youtu.be/m_py5jKHkBQ?si=pBeX-CNeDwvab_SU [21:15 onward].

³⁰⁰ *Ibid.*

³⁰¹ Statement of MK Tzvi Succot (Religious Zionism Party) at the Knesset, "Knesset Committee Discussion", *Knesset Channel* (2 January 2024), <https://www.knesset.tv/special-event/video/62475/>, [1:12:00]; MK Tzvi Succot, @tzvisuccot, Tweet (8:18 pm, 2 January 2024), <https://x.com/tzvisuccot/status/1742248981433065787>; also available at Younis Tirawi, @ytirawi, Tweet (9:58 pm, 2 January 2024), <https://twitter.com/ytirawi/status/1742304288221925541>.

³⁰² MK Limor Son Har-Melech (Otzma Yehudit) at "The Central Stage, 8.4.24", *Knesset TV* (8 April 2024), <https://www.knesset.tv/tv-shows/hazira-hamerkazit/video/65627/> [0:46:06], also available at Middle East Eye, @middleeasteye, TikTok (15 April 2024), <https://www.tiktok.com/@middleeasteye/video/7358018826467904800>.

³⁰³ MK Avigdor Liberman (Yisrael Beiteinu), @AvigdorLiberman, Tweet (7:45 pm, 30 November 2023), <https://twitter.com/avigdorliberman/status/1730297081959530685>.

³⁰⁴ Now 14, @Now14Israel, Tweet (10:50 pm, 1 November 2023), <https://twitter.com/Now14Israel/status/1719834297832526215>.

³⁰⁵ Knesset TV, Facebook (16 October 2023), https://www.facebook.com/watch/live/?ref=watch_permalink&v=3497251110531404 [2:29:57]. Also available at Jonathan Ofir, "Israeli Politician Says 'Children of Gaza Have Brought This Upon Themselves'", *Truthout* (18 October 2023), <https://truthout.org/articles/israeli-politician-says-children-of-gaza-have-brought-this-upon-themselves/>.

³⁰⁶ MK Ariel Kallner (Likud), @ArielKallner, Tweet (11:29 pm, 7 October 2023), <https://twitter.com/ArielKallner/status/1710769363119141268>. Also available at Jessica Buxbaum, "Erase Gaza: How genocidal rhetoric became normalised in Israel", *The New Arab* (30 November 2023), <https://www.newarab.com/analysis/erase-gaza-how-genocidal-rhetoric-normalised-israel>.

“for Gaza’s residents”,³⁰⁷ both praising and participating in protests blocking aid convoys carrying life-saving humanitarian aid to the starving population of Gaza.³⁰⁸

33. On 2 January 2025, a letter was circulated addressed to the Minister of Defence of Israel, Israel Katz, signed by eight MKs of the Foreign Affairs and Defense Committee,³⁰⁹ demanding a “re-examin[ation of] the operational plan of combat in the Gaza Strip”. They urged the Minister to “in the northern Gaza Strip and likewise in every other area” ensure the “(1) Remote destruction of all energy sources, i.e. fuel, solar power systems and any relevant tools (pipes, cables, generators, etc.); (2) Destruction of all sources of food, including warehouses, water and any relevant tools (water pumps, etc.); (3) Remote elimination of anyone who moves in the area and does not come out with a white flag when the siege is in effect”.³¹⁰

34. Further illustrative examples of MKs’ incitement are set out below.

Incitement to Genocide by Coalition MKs

35. Israel’s Governing coalition currently consists of the Likud party — led by the Prime Minister, Benjamin Netanyahu, who is also the chairman of the Party — which holds the plurality of seats in the Knesset and formed a coalition to create a ruling majority with Otzma Yehudit (chaired by Minister of National Security Itamar Ben-Gvir) (until 19 January 2025, when Otzma Yehudit left the coalition), the Religious Zionism Party (chaired by Minister of Finance, Bezalel Smotrich), Noam, Shas and United Torah Judaism.³¹¹ The National Unity Party (Chaired by Minister without Portfolio, Benjamin Gantz) joined the coalition on 12 October 2023 and left the coalition on 9 June 2024.³¹²

36. **Likud MK Boaz Bismuth** — a former journalist and Israeli Ambassador — incited genocide, including by calling for the closure of UNRWA — the backbone of the humanitarian effort in Gaza,³¹³ to his more than 86,000 followers on X, as follows:

- On 16 October 2023, he stated: “We must not forget that the cruel and monstrous ‘innocent civilians’ also actively participated in the pogrom within Israeli communities [literally settlements but meant as a catch-all term for cities, villages, kibbutzim, etc.], in the systematic murder of Jews and their bloodshed, in kidnapping children, elderly people, and mothers and tying up babies and burning them alive! One must not show mercy to the cruel, there is no space for any humanitarian gesture — the memory of Amalek must be erased!”³¹⁴

³⁰⁷ MK Limor Son Har-Melech (Otzma Yehudit), @limor_sonhrmelh, Tweet (2:26 pm, 28 January 2024), https://twitter.com/limor_sonhrmelh/status/1751597625407569991.

³⁰⁸ MK Nissim Vaturi (Likud) at “The Central Stage With Mazal Mualem 15.05.2024”, *Knesset TV* (15 May 2024), https://youtu.be/m_py5jKHkBQ?si=pBeX-CNeDwvab_SU [21:15]: “I came and blocked the road with my vehicle as well, a month and two months ago”. See, also for example: MK Revital Gotlieb (Likud), @TallyGotliv, Tweet (1:30 pm, 31 January 2024), <https://twitter.com/TallyGotliv/status/1752670702858072329>; MK Tzvi Sukkot (Religious Zionism Party), @tzvisuccot, Tweet (10:47 am, 1 February 2024), <https://twitter.com/tzvisuccot/status/1752991982169751682>.

³⁰⁹ Initiated by MK (Likud) Amit Halevi, signatories include MK (Likud) Ariel Kallner; MK (Likud) Nissim Vaturi; MK (Likud) Osher Shekalim; MK (Religious Zionism Party) Ohad Tal, MK (Religious Zionism Party) Tzvi Sukkot; MK (Shas) Avraham Betsalel; MK (Otzma Yehudit) Limor Son Har-Melech.

³¹⁰ Etan Nechin, @Etanetan23, Tweet (5:13 pm, 2 January 2024), <https://x.com/Etanetan23/status/1874851566190256637>; Shirrit Avitan Cohen, “Controversial ‘Generals’ Plan’ in northern Gaza picks up steam”, *Israel Hayom* (2 January 2025), <https://www.israelhayom.com/2025/01/02/knesset-committee-pushes-for-controversial-generals-plan-in-gaza/>.

³¹¹ “Who’s who in the new Netanyahu-led government”, *The Times of Israel* (29 December 2022), <https://www.timesofisrael.com/whos-who-in-the-new-netanyahu-led-government/>.

³¹² Sam Sokol, “Gantz announces he is leaving coalition, says Netanyahu preventing ‘true victory’”, *The Times of Israel* (9 June 2024), https://www.timesofisrael.com/liveblog_entry/gantz-announces-he-is-leaving-coalition-says-netanyahu-preventing-true-victory/; The Knesset, @KnessetENG, Tweet (8:29 pm, 12 October 2023), <https://x.com/KnessetENG/status/1712535969981935912>.

³¹³ United Nations Geneva, @UNGeneva, Tweet (12:00 pm, 2 November 2024), <https://x.com/UNGeneva/status/1852667182322171916>.

³¹⁴ MK Boaz Bismuth (Likud), @BismuthBoaz, Tweet (9:02 am, 16 October 2023), <https://twitter.com/BismuthBoaz/status/1713812686784311358>.

- On 2 July 2024, speaking before the Foreign Affairs and Defense Committee, he argued: “It is inconceivable that after UNRWA employees took part in acts of terrorism, raped, murdered and kidnapped our citizens to Gaza, the agency will continue to operate in our eternal and united capital. Soon we will expel UNRWA from Jerusalem.”³¹⁵

37. On 18 August 2024, **Likud MK Avichay Buaron** referenced Amalek in a statement after a report — later proven false — that the State Attorney had recommended a criminal investigation of singer Eyal Golan for the latter’s public statement that “Gaza should be erased” (“blotted out”): “First of all, to clear any doubt, I too believe Gaza should be erased. And yes, the Gazans should scatter all around the world . . . Now, after we fulfilled the obligatory Mitzva to remember,³¹⁶ let me tell you who Amit Aisman is [the State Attorney]? . . .”³¹⁷

38. **Likud MK Galit Distel Atbaryan** and former Minister of Information (29 December 2022 to 12 October 2023) has also dehumanised Palestinians and incited genocide against Palestinians in Gaza:

- On 26 January 2024, she asserted to her 128,000 followers on X that all the children in Gaza are “indoctrinated from the age of three to bloodthirst and death”.³¹⁸
- On 1 November 2023, having watched Israeli army footage of the 7 October 2023 attacks by Hamas and others, she urged Israelis to “[i]nvest this energy in one thing; erasing all of Gaza from the face of the earth”. She stated: “Let the Gazan monsters rush to the southern fence and flee into Egypt’s territory. Or let them die. And let them die badly. Gaza should be erased. And fire and pillars of smoke [Joel 3:3] on the heads of the Nazis in Judea and Samaria. A Jewish rage that will shake the earth of the world. A vengeful and cruel IDF is needed here. Anything less than that is immoral. Simply immoral”.³¹⁹

39. **Likud MK Revital (‘Tally’) Gotliv**, a Member of the Knesset’s Constitution, Law and Justice Committee; Special Committee for the Rights of the Child; Labour and Welfare Committee and State Control Committee, publicly incited the genocide of Palestinians in Gaza, including by posts on X receiving millions of views.³²⁰ By way of illustrative example:

- On 7 October 2023, she called for “No excuses! Crush Gaza. Disconnect water and electricity just to begin with. Damage the infrastructure not only of Hamas. The people of Israel are waiting for fire strikes of tremendous intensity on Gaza!”³²¹ and called to “not bomb empty targets. As long as there are happy and

³¹⁵ Hezkei Barouch, “MK Boaz Bismut: ‘Soon we will expel UNRA from Jerusalem’”, *Channel 7 News* (2 July 2024), <https://www.inn.co.il/news/642024>.

³¹⁶ *I.e.*, “Remember what Amalek did to you after you left Egypt — how, undeterred by fear of God, he surprised you on the march, when you were famished and weary, and cut down all the stragglers in your rear. Therefore, when your God grants you safety from all your enemies around you, in the land that your God is giving you as a hereditary portion, you shall blot out the memory of Amalek from under heaven. Do not forget!” [Deuteronomy 25:17-19], Sefaria, Deuteronomy 25:17-19, JPS, 1985, <https://www.sefaria.org/Deuteronomy.25.19>.

³¹⁷ MK Avichay Buaron (Likud), @AvichayBuaron, Tweet (10:29 pm, 18 August 2024), <https://x.com/AvichayBuaron/status/1825268896401961155>; B.M., @ireallyhateyou, Tweet (7:07 pm, 24 August 2024), <https://x.com/ireallyhateyou/status/1827392194660941972>.

³¹⁸ MK Galit Distel Atbaryan (Likud), @GalitDistel, Tweet (2:04 pm, 26 January 2024), <https://twitter.com/GalitDistel/status/1750867185839247739>.

³¹⁹ MK Galit Distel Atbaryan (Likud), @GalitDistel, Tweet (1:13 pm, 1 November 2023), <https://twitter.com/GalitDistel/status/1719689095230730656>.

³²⁰ See for example MK Revital Gotliv (Likud), @TallyGotliv, Tweet (6:59 pm, 9 October 2023), <https://twitter.com/TallyGotliv/status/1711426284322996613> (“A Jericho missile! A Jericho missile! Strategic deterrence. Before we consider sending in troops. The doomsday weapon! That is my opinion. G-d save all of our troops.”), which has received 2.4 million views.

³²¹ MK Revital Gotliv (Likud), @TallyGotliv, Tweet (11:17 am, 7 October 2023), <https://twitter.com/TallyGotliv/status/1710585128131383761>.

rejoiceful people in Gaza its a sign that we are not fulfilling our duty. Members of the government it is your duty to decide fearlessly! Now you must decide to crush Gaza! A massive strike of fire that Gaza will not forget. Kilometers into Gaza crush and flatten [sic]. Do not wait!! . . . ”³²²

- On 9 October 2023, posting on X, she called for a “Jericho missile! A Jericho missile! . . . The doomsday weapon!” to be dropped on Gaza, prior to the Israeli military’s ground assault.³²³
- On 10 October 2023, she followed this up with a ‘tweet’ asserting that: “Only an explosion that shakes the Middle East will restore this country’s its dignity, its strength and its security! It’s time for the doomsday weapon. Launching powerful missiles without limit. Not flattening a neighbourhood. Crushing and flattening Gaza. Otherwise we’ve done nothing. Not with slogans, with penetrating bombardments. Mercilessly! Mercilessly!”³²⁴
- On 23 October 2023, in a debate in the Knesset, she objected to the first — minimal — humanitarian convoy since 8 October 2023, carrying essential supplies including food, water and medicine permitted by Israel to enter Gaza,³²⁵ stating: “Without hunger or thirst among the Gazan population, we will not be able to recruit collaborator[s], . . . we will not be able to bribe people, with food, with drink, with medicine, to get intelligence . . . ”³²⁶
- On 29 October 2023, she ‘tweeted’ ““May your village burn’!! Yes, yes, from my point of view [that’s a] great morale [chant] wishing Gaza to be erased and burned. I’ve said more than once [that] revenge is a value. . . ”³²⁷ “May your village burn” is a racist, anti-Palestinian football chant and song,³²⁸ repeatedly chanted by Israeli soldiers,³²⁹ or played as the background to videos by Israeli soldiers blowing up or setting fire to Palestinian homes, buildings and villages in Gaza.³³⁰
- On 1 November 2023, she called for the erasure of Gaza and ‘tweeted’: “There’s no person in the world that won’t realize the magnitude of [our] legitimacy and [our] duty to trample and destroy Gaza.”³³¹

³²² MK Revital Gotliv (Likud), @TallyGotliv, Tweet (1:35 pm, 7 October 2023), <https://twitter.com/TallyGotliv/status/1710619957258526881>.

³²³ MK Revital Gotliv (Likud), @TallyGotliv, Tweet (6:59 pm, 9 October 2023), <https://twitter.com/TallyGotliv/status/1711426284322996613>.

³²⁴ MK Revital Gotliv (Likud), @TallyGotliv, Tweet (11:41 am, 10 October 2023), <https://x.com/TallyGotliv/status/1711678420235534705>.

³²⁵ Ministry of Foreign Affairs, *Security Cabinet convenes and makes series of operational decisions* (8 October 2023), <https://www.gov.il/en/pages/security-cabinet-convenes-and-makes-series-of-operational-decisions-8-oct-2023>: “Among the decisions made by the Security Cabinet is halting the supply of electricity, fuel and goods”; UN News, *Israel-Palestine: Lack of fuel in Gaza now critical says WFP* (23 October 2023), <https://news.un.org/en/interview/2023/10/1142707>.

³²⁶ Statement by MK Revital Gotliv (Likud) in the Knesset: Knesset Channel, @KnessetT, Tweet (7:10 pm, 23 October 2023), <https://twitter.com/KnessetT/status/1716502486331113922>.

³²⁷ MK Revital Gotliv (Likud), @TallyGotliv, Tweet (7:10 pm, 29 October 2023), <https://twitter.com/TallyGotliv/status/1718676748542296207>.

³²⁸ Nimer Sultany, @NimerSultany, Tweet (1:14 pm, 6 March 2024), <https://x.com/NimerSultany/status/1765350242327646397?t=iXdGPVgypJAXUIMF3RNXaw&s=08>. See original chant by football club Beitar fans: “‘Akfar’ - Beitar Fans”, *FCBJS1936* (24 February 2017), <https://www.youtube.com/watch?v=otxRkFwp824>; see also e.g. “Peretz sings may your village burn 2”, *OfekCenter* (26 November 2023), <https://www.youtube.com/watch?v=xcH2o4c5KZY>.

³²⁹ Younis Tirawi, @ytirawi, Tweet (11:47 am, 6 March 2024), <https://twitter.com/ytirawi/status/1765313264324333905>; Younis Tirawi, @ytirawi, Tweet (9:40 pm, 19 February 2024), <https://twitter.com/ytirawi/status/1759679360842313849>; See e.g. “Ishmacha Hatani: the moving tribute of the singer Kobi Peretz to the fighters in the south”, *Now 14* (26 November 2023), <https://www.now14.co.il/קובי-פרץ-התחייב-אם-תיקחו-מצוות-תפילין>; John Brown, @brown_johnbrown, Tweet (7:44 pm, 14 November, 2023), https://twitter.com/brown_johnbrown/status/1724498543346422241; “Peretz sings may your village burn 2”, *OfekCenter* (26 November 2023), <https://www.youtube.com/watch?v=xcH2o4c5KZY>.

³³⁰ See e.g., Younis Tirawi, @ytirawi, Tweet (9:12 pm, 31 January 2024), <https://twitter.com/ytirawi/status/1752771808531517628>.

³³¹ Revital Gotliv, @TallyGotliv, Tweet (7:10 pm, 1 November 2023), <https://twitter.com/TallyGotliv/status/1719763894762152433>.

- On 7 December 2023, she also echoed the Israeli President's remark that "[i]t's not true this rhetoric about civilians not aware not involved", stating on X: "Enough feeling sorry for 'uninvolved' Gazans. There are no uninvolved. Every Gazan who remains in a war zone is a collaborator for a terror organization. Enough! . . . Destroy any place where there are terrorists and terrorist collaborators. From the air!! Do not endanger soldiers if bombing from the air is possible!"³³²
- On 13 December 2023, she 'tweeted' similarly that "[t]here are no uninvolved, neither in Khan Younis nor in Shuja'iyya. They are all marked for death. This must be the working assumption".³³³ She called for Israel to "bomb" Gaza "mercilessly from the air!"³³⁴
- On 31 January 2024 — five days after the International Court of Justice's January Order — she decried the fact that protestors blocking aid into Gaza at the Kerem Shalom / Karem Abu Salem crossing had been stopped by police,³³⁵ 'tweeting': "Sorry. Sorry. I am ashamed when, during the shift of a 'full' right-wing government, they arrest our best people [,] who came to protest against the transport of flour and fuel to Hamas at the Kerem Shalom crossing. Proud of you. I ask for your forgiveness. What a disgrace!"³³⁶
- On 9 May 2024, after the United States delayed the delivery of precision missiles to Israel, she stated on Israeli television Channel 7 that Israel should instead use missiles which are imprecise and thus more destructive, stating "We have imprecise missiles. . . So maybe instead of using a precise missile and taking down a specific room or a specific building, I'll use my imprecise missiles and I'll just collapse ten buildings. Ten buildings".³³⁷
- On 10 May 2024, after Israel began its ground invasion of Rafah, she posted on X: "G-d. Why not attack from the air?? How many more times will I ask this? The citizens of Rafah received an evacuation notice. Whoever hasn't evacuated is physically shielding Hamas terrorists and Palestinian Islamic Jihad. Attack from the air with no mercy! Avenge the blood of our murdered! This is the language the enemy understands. Only so will we lead to the enemy's surrender. Attack Rafah like we attacked in the north of the Gaza Strip. G-d will avenge the blood of our soldiers, glorious heroes . . . Attack from the air without mercy. Instead of looking towards the court in The Hague, look towards the people of Israel."³³⁸
- On 2 July 2024, she condemned the State Attorney's rumoured — later proven untrue — recommendation to open a criminal investigation into the Minister of National Security: "Attorney Amit Aisman. Ahlan Wa-Sahalan [Hello in Arabic]. I am MK Tally Gotliv. With emphasis on the title of MK, immunity etc. I am not addressing you as a friend (since I am not really into a man that speaks of thongs and bodily pain with his [female] intern), I am addressing you because this time even your colleagues think you've lost it. You demanded the investigation of Minister Ben Gvir, with emphasis on Minister, immunity etc., for incitement against the residents

³³² MK Revital Gotliv (Likud), @TallyGotliv, Tweet (5:46 pm, 7 December 2023), <https://twitter.com/TallyGotliv/status/1732788632430186872>.

³³³ MK Revital Gotliv (Likud), @TallyGotliv, Tweet (9:39 am, 13 December 2023), <https://twitter.com/TallyGotliv/status/1734840416522948800>.

³³⁴ *Ibid.*

³³⁵ "Dozens of protesters said detained amid clashes at Kerem Shalom over aid to Gaza", *The Times of Israel* (31 January 2024), https://www.timesofisrael.com/liveblog_entry/dozens-of-protesters-said-detained-amid-clashes-at-kerem-shalom-over-aid-to-gaza/.

³³⁶ MK Revital Gotliv (Likud), @TallyGotliv, Tweet (2:30 pm, 31 January 2024), <https://twitter.com/TallyGotliv/status/1752670702858072329>.

³³⁷ Younis Tirawi, @yitirawi, Tweet (6:15pm, 8 May 2024), <https://x.com/ytirawi/status/1788241394340929690>.

³³⁸ MK Revital Gottlieb (Likud), @TallyGotliv (6:02 pm, 10 May 2024), <https://x.com/TallyGotliv/status/1788962952176976231>.

of Gaza?? Do you get it? The residents of Gaza! Can there be a more outrageous political persecution? I trust you won't stop trying, Good luck to you . . ."³³⁹

- On 20 August 2024, she stated in an interview on Israeli television: "in my opinion the Jericho missiles are needed. . . which has strong ballistic capabilities, with very large damage capabilities. . .".³⁴⁰ The fellow interviewee, Noga Arbell,³⁴¹ a former official of the Israeli foreign ministry and researcher with the Kohelet Policy Forum,³⁴² remarked that the erasure of Gaza was already in process saying: "Tally [Gotliv], I'd like to remind you that at this very moment in Gaza, the IDF is in the middle of a process, to those that haven't noticed, of the destruction of Gaza!"³⁴³

40. **Likud MK Amit Halevi** has also dehumanised Palestinians and demonstrated genocidal intent:

- On 16 October 2023, he stated in the Knesset: "This victory should have two directives: 1. No more Muslim land in the Land of Israel. What they imagine as 'Dar al-Islam' [Arabic phrase, 'the house of Islam'] will forever be Israeli land. 'Al-ard al-muqadisa' [Arabic phrase, 'the holy land'] that belongs to the people of Israel, which, by the way, just like in the Quran. That is victory. And after we turn it into land of Israel, Gaza should remain like a memorial, like Sodom, 'beyond sowing and producing' [Deuteronomy 29:22]. And the second and last aim: Full Israeli control. Not a [unintelligible]! Not an [unintelligible]! Full control, military and civilian. And nothing less than that. That is what it means to defeat the Bad Idea, Mr. Chairman. That will be the answer to the murderers, and also to the world that is looking at us."³⁴⁴
- On 1 November 2023, he stated that: "There are only two types of Palestinians in Gaza right now: Those who support [Hamas] or are graduates of Hamas's Nazi education, and Palestinians that serve as their human shields. We can and must bomb them both".³⁴⁵
- On 28 June 2024, during his speech at the 'Gaza March', he stated that: "the straight path is a return to full control over Gaza. Not Gush Katif, but 3,4, 5 large cities need to be built in this space, without fences, and without a perimeter. We have one Ashkelon here to the north; there should be 3-4 other Ashkelons [all around] here, all the way to Rafah".³⁴⁶
- In July 2024 a video emerged of him stating in an interview: "I remember Herzi [Halevi] boasting about his raid on Al-Shifa. Well he captured in the ward, I don't remember, let's say in the orthopedic ward, 150 terrorists and killed them. And at the very same time, in the maternity ward, 300 terrorists were born. 300. . . [Interviewer: 300 children, not terrorists] Yes, terrorists".³⁴⁷

³³⁹ Revital Gotliv, @TallyGotliv, Tweet (8:14 pm, 2 July 2024), <https://x.com/TallyGotliv/status/1808202682542576124>.

³⁴⁰ Younis Tirawi, @ytirawi, Tweet (4:12 pm, 22 August 2024), <https://x.com/ytirawi/status/1826623359456858604>.

³⁴¹ See also Annex III, remarks by Noga Arbell re: UNRWA, available at Middle East Eye, @MiddleEastEye, Tweet (7:42 am, 28 January 2024), <https://x.com/MiddleEastEye/status/1751480836682399772>.

³⁴² Israel, The Knesset, *Subcommittee for Foreign Policy and Public Diplomacy discusses UNRWA's activity during Swords of Iron war; MK Elkin, chair: "Very alarming details revealed about use of UNRWA for Hamas terror"* (7 January 2024), <https://main.knesset.gov.il/EN/News/PressReleases/Pages/press7124q.aspx>, see also Etgar Lefkowitz, "Israeli lawmakers ponder UNRWA overhaul", *JNS* (9 January 2024), <https://www.jns.org/israeli-lawmakers-ponder-unrwa-overhaul/>.

³⁴³ Younis Tirawi, @ytirawi, Tweet (4:12 pm, 22 August 2024), <https://x.com/ytirawi/status/1826623359456858604>.

³⁴⁴ "Live broadcast: Opening a conference. First plenary in the shadow of the war", *Knesset Channel* (16 October 2023), <https://www.youtube.com/live/4xp4WhNyPBQ?si=iVQcYEIbZQZIt1iB&t=9626> [2:40:24].

³⁴⁵ Hezki Baruch, "MK Amit Halevi to Blinken: 'this is not the time to choose, now we are bombing'", *Israel National News* (1 November 2023), <https://www.inn.co.il/news/618612>.

³⁴⁶ B.M., @ireallyhateyou, Tweet (8:26 pm, 27 June 2024), <https://x.com/ireallyhateyou/status/1806600754699895186>.

³⁴⁷ Palestine Online, @OnlinePalEng, Tweet (7:46 pm, 8 July 2024), <https://x.com/OnlinePalEng/status/1810369841750237230>.

41. **Likud MK Ariel Kallner** also inciting genocide. On 7 October 2023, he ‘tweeted’ support for a second Nakba, stating: “Right now, one goal: Nakba! A Nakba that will overshadow the Nakba of 48. Nakba in Gaza and Nakba to anyone who dares to join!”.³⁴⁸

42. **Likud MK Hanoch Milwidsky** has made several inciting statements, deeming the rape of Palestinian detainees legitimate and rallying against Palestinian self-determination:

On 21 February 2024, during a procedural government announcement in the Knesset broadcast on Knesset TV, he stated to fellow MK Ayman Odeh, who is a Palestinian citizen of Israel that “[t]here will never be a Palestinian state. You will die, your children will die, your grandchildren will die – there won’t be a Palestinian state, there won’t be”.³⁴⁹

On 29 July 2024, during a Knesset committee meeting in which the arrest at Sde Teiman of Israeli soldiers for the rape of a Palestinian detainee from Gaza was raised and discussion ensued, which resulted in TA’AL MK Ahmad Tibi’s question if “[i]nserting a stick into a person’s rectum, that’s legitimate?”, MK Milwidsky responded “[y]es! If he’s a Nukhba anything done to him is legitimate! Anything!”.³⁵⁰

43. **Likud MK Eliyahu Revivo** has incited genocide, including on 1 November 2023, when he ‘tweeted’ in response to the Knesset having screened a video montage of the events that unfolded on 7 October 2023: “. . . *every* resident of the Strip who does not fight against ISIS-Gaza, deserves to die. I am convinced that it will be possible to evacuate those few sane people from the Strip. Dear citizens of Israel, obtaining the world’s support for Hamas’s elimination is not considered an achievement, and there is no sense in creating an equation that differentiates those who wear uniform and the rest of the residents there[,] except for[,] as mentioned[,] excluding those who resist that oppressive regime! Therefore, I am full of hope and expect that decision makers will clarify the updated war objectives to the world. Crushing Gaza with all its inhabitants. They have set the norms both for us and for them and we will work to not disappoint them[.] And we will act, G-d willing, with strength, determination and composure until the definite victory. I pursued my enemies and overtook them; I did not turn back till I destroyed them. [Psalm 18:38] Together we will win! [Israel flag emoji]”³⁵¹

44. On 2 January 2024, Channel 14 published an interview with **Likud MK Moshe Sa’ada** in which he stated, *inter alia*: “it is clear to everyone today that the right wing was right, on the political issue, on the Palestinian issue, today it’s simple, you go anywhere and they tell you ‘exterminate them’ [the Palestinians], in the kibbutzim they tell you ‘exterminate them’ my [former] colleagues in the [Justice Department’s] Attorney’s office, who fought me on the political issues, in arguments, they tell me ‘Moshe, it’s obvious [we] need to exterminate all Gazans’. These are statements I had never heard”.³⁵²

³⁴⁸ MK Ariel Kallner (Likud), @ArielKallner, Tweet (10:29 pm, 7 October 2023), <https://twitter.com/ArielKallner/status/1710769363119141268>. Also available in the New Arab: “‘Erase Gaza’: How genocidal rhetoric became normalised in Israel”, *The New Arab* (30 November 2023), <https://www.newarab.com/analysis/erase-gaza-how-genocidal-rhetoric-normalised-israel>.

³⁴⁹ Eye on Palestine, @EyeonPalestine, Tweet (10:11 pm, 21 February 2024), <https://x.com/EyeonPalestine/status/1760396928540442888>.

³⁵⁰ B.M., @ireallyhateyou, Tweet (2:44 pm, 29 July 2024), <https://x.com/ireallyhateyou/status/1817904053462196523>.

³⁵¹ Eliyahu Revivo, @revivoelياهو, Tweet (4:46 pm, 1 November 2023), <https://twitter.com/revivoelياهو/status/1719727722459508915>.

³⁵² “MK Moshe Saada: ‘Our responsibility is to defeat and destroy Hamas’”, *Now 14* (2 January 2024), <https://www.youtube.com/watch?v=nrrSQRQWPpU>; also available at Middle East Eye, @MiddleEastEye, Tweet (3:26 pm, 3 January 2024), <https://twitter.com/MiddleEastEye/status/1742568046340800844>.

45. **Likud MK Katrin ‘Keti’ Shitrit-Peretz** has also made various statements dehumanising Palestinians, inciting genocide against Palestinians and evidencing genocidal intent:

On 1 November 2023 in an interview broadcast on Israeli television, she stated — echoing the words of the Israeli President inciting genocide — that: “The word revenge has been used a lot in recent days. I don’t call it revenge, I call it justice . . . If you ask me right now, if you’re asking Keti on a personal level, not [as] a Knesset member, I [would] flatten Gaza. I don’t have any sentiments. Because we must not separate between the murderers of women and children and the ‘citizens of Gaza’ [making air quotes with her hands]. It’s not the same”.³⁵³

On 3 November 2024, she stated on Israeli television Channel 14: “[the current generation of people in Gaza] I call it a broken [as in ‘out of order’ or ‘rotten’, not ‘broken spirit’] generation, that was taught to hate, that was taught that the more they harm us, the better it will be for them. . . Zero tolerance towards them . . . What partner? There is not a single person, not a single human being [there], no human beings. There’s despicable people, horrible people [there]. People who came to murder with glee . . . This is a tool that can help you understand mainly that the other side are bloodthirsty people. We all know who lives in the Gaza Envelope — we all know that good people lived in the Gaza Envelope, [people] who believed in unity, peace and in [being] very compassionate towards those Arabs. And by the way — I do not make a distinction between the terrorist murderers and the civilian population in Gaza. It’s the same thing as far as I’m concerned. As far as I’m concerned, there’s no difference between them. When you go help a [Gazan] woman get medical treatment in Israel, that woman gave birth to a terrorist. She went to the voting booth and voted for Hamas. As far as I’m concerned she is an accomplice. Unequivocally. A full accomplice”.³⁵⁴

46. **Religious Zionism Party MK Tzvi Suddot** — Chairman of the Knesset Subcommittee for the West Bank³⁵⁵ — has made various statements inciting genocide, including the following:

- On 3 January 2024, in an interview broadcast on Knesset TV, he called for a second Nakba in Gaza:

Reporter 2: “I nevertheless would like to continue your thesis about settlements in the north of the Strip. What do we do with the population that lives there and now lives in tents in the south?”

MK Suddot: “First of all I reject this whole idea that we have a responsibility towards the residents of Gaza. [...] The residents of Gaza [...] murdered 1400 of our people, they all voted for Hamas, supported Hamas, and we don’t have any responsibility towards these people. What would I do with them? It’s none of my business. I’m not letting them return home. As long as it’s up to me: you fled? Don’t come back. Just like in Tel Aviv, just like in many more places in the state of Israel. [...] They fled because there was warfare, like here by the way. I think Giv’at Ram lays on the ruins of an Arab village. Also Tel Aviv University lays on the ruins

³⁵³ Video at Channel 14, @Now14Israel, Tweet (10:50 pm, 1 November 2023), <https://x.com/Now14Israel/status/1719834297832526215>.

³⁵⁴ “Keti Shitrit describes in shock: ‘After their parents were murdered in front of them, the children asked the terrorists, ‘Are you going to kill us?’”, *Now 14* (3 November 2023), <https://www.youtube.com/watch?v=b8xrtLZKd50>.

³⁵⁵ Jeremy Sharon, “Ultranationalist MK Tzvi Suddot appointed head of Knesset West Bank subcommittee”, *The Times of Israel* (1 November 2023), <https://www.timesofisrael.com/ultranationalist-mk-tzvi-suddot-appointed-head-of-knesset-west-bank-subcommittee/>.

of an Arab village, because that's what happened in '48. They messed with us, fought, tried to kill us, couldn't do it, fled, we settled there."³⁵⁶

- On the same day, he further called for the total destruction of northern Gaza and for building Israeli settlements, in an interview with Israeli news channel, Channel 12, reportedly stating "Jewish settlement on ruins of Palestinian villages is a message we must convey,"³⁵⁷ and in a hearing held at the Knesset that "[a]t least the northern Strip we must first of all conquer, annex, raze all the buildings and build neighbourhoods."³⁵⁸ He later tweeted: "Conquer, annex, destroy all the houses there, build large and wide new neighborhoods, large settlements that will be named after the nation's heroes who fought there, distribute allotments to the soldiers who fought, to the wounded who fought — so that Palestine Square be turned into the Israeli Heroism Square".³⁵⁹

47. **Religious Zionism Party MK Michal Waldiger** posted on X on 1 November 2023: "These despicable murderers do not deserve to be called an 'enemy'. This thing has no right to exist in the world. They must be exterminated. This is an unavoidable war [literally: a war of no choice], for us and for the entire world. The citizens of Gaza participated in the massacre as well, with inconceivable cruelty, so don't talk about uninvolved. The world needs to know that it is next in line, and if we don't hurry to destroy 'this thing' rivers of blood in London are only a matter of time".³⁶⁰

48. **Otzma Yehudit MK Almog Cohen (in the coalition until 19 January 2025)**, in a Senior Cabinet hearing on allowing injured and sick Palestinians from Gaza for treatment, was recorded stating: "I love my people, I hate my enemies, I want to abuse them . . . how is such a hearing taking place? When did we lose our will to live? . . . I voiced the cry of our people, because there is a consensus . . . as soon as I hear they enter the country, I will use my immunity to physically block them".³⁶¹ He is further recorded saying "How come we're discussing the health conditions of our enemies? On October 7th, all of Gaza rejoiced when our sisters were raped. The petition should not be discussed here. When we receive information about [the] Bibas [hostages], we'll be able to discuss such things".³⁶²

49. **Otzma Yehudit MK Limor Son Har-Melech (in the coalition until 19 January 2025)** has also on multiple occasions incited genocide in Gaza and celebrated its destruction. Several of those statements are:

- On 10 October 2023, she called on her fellow Israeli nationals on X that: "A. The time for unity has arrived! B. There are no innocents in Gaza. C. Maximum suffocation of the entire infrastructures in Gaza (electricity, water, internet, fuel, food etc.). D. Gaza must literally be flattened. Especially lower Gaza where all Hamas people are. They should all be erased! E. Vengeance is the worthiest and

³⁵⁶ Knesset Channel, @KnessetT, Tweet (7:32 pm, 3 January 2024), <https://x.com/KnessetT/status/1742599787659088222>.

³⁵⁷ "Israeli MP: 'Jewish settlement on ruins of Palestinian villages is a message we must convey'", *Middle East Eye* (3 January 2024), <https://www.middleeasteye.net/live-blog/live-blog-update/israeli-mp-jewish-settlement-ruins-palestinian-villages-message-we-must?nid=331061&topic=Israel-Palestine%2520war&fid=496206>.

³⁵⁸ "Genocide Charge Against Israel Must Serve as a Wake-up Call", *Haaretz* (3 January 2024), <https://www.haaretz.com/opinion/editorial/2024-01-03/ty-article-opinion/genocide-charge-against-israel-must-serve-as-a-wake-up-call/0000018c-d113-daf6-a5df-d77f2f370000>; Tzvi Succot, @tzvisuccot, Tweet (8:18 pm, 2 January 2024), <https://x.com/tzvisuccot/status/1742248981433065787>; Statement of MK Tzvi Sukkot (Religious Zionism Party) at the Knesset, "Knesset Committee Discussion", Knesset Channel (2 January 2024), <https://www.knesset.tv/committees/conventions/video/62475/>; also available at Younis Tirawi, @ytirawi, Tweet (9:58 pm, 2 January 2024), <https://twitter.com/ytirawi/status/1742304288221925541>.

³⁵⁹ Tzvi Succot, @tzvisuccot, Tweet (8:18 pm, 2 January 2024), <https://x.com/tzvisuccot/status/1742248981433065787>.

³⁶⁰ Michal Waldiger, Tweet (3:50 pm, 1 November 2023) <https://twitter.com/michalwoldiger/status/1719713634127905078>.

³⁶¹ Channel 14, @Now14Israel, Tweet (12:30 pm, 1 July 2024), <https://x.com/Now14Israel/status/1807723517254754339>.

³⁶² Yehuda Schlesinger, @judash0, Tweet (10:56 am, 1 July 2024), <https://x.com/judash0/status/1807699844678483999>.

most moral thing. F. As long as [we] do not internalize and complete all the aforementioned conclusions no soldier but no soldier enters Gaza!”.³⁶³

- On 18 September 2024, a documentary was released in which she is filmed enjoying a boat trip for the settlement movement to the sea of Gaza, watching Gaza being bombarded, saying: “With G-d’s help, the people of Israel will win, and we will build and witness the return of G-d to Zion and the return of Israel to the Gaza region”.³⁶⁴

50. **Otzma Yehudit MK Yitzhak Kreuzer (in the coalition until 19 January 2025)** is one of the Israeli Knesset’s representatives to the Judicial Selection Committee.³⁶⁵ On 5 November 2023, the same day that the Minister of Heritage, Amichai Eliyahu, stated that dropping a nuclear weapon on Gaza was an option,³⁶⁶ he asserted in an interview on Israeli radio Channel 94fm, that:

“The Gaza Strip must be flattened. . . It’s not a matter of [using] an atom bomb, I think Minister Amichai Eliyahu’s message was very clear: Gaza has to be wiped off the map, in order to send a very clear message to all our enemies and those who seek us harm. . . In the Gaza Strip, we must be clear, there are no innocent [civilians]. There are no “uninvolved” people. If we go back to [October 7], the mob that broke into the Kibbutzim, raped murdered and pillaged, those were not armed militants wearing bands on their foreheads identifying them as part of this or that organization, they were Gazan civilians who up until recently worked in agriculture and construction, and to our dismay entered and worked in the Kibbutzim as well and elsewhere in Israel — in construction and agriculture, as I’ve mentioned. Therefore we shouldn’t get confused, we define these people are Nazis, and not for nothing: the Nazis had [only] one sentence — death.”³⁶⁷

51. **Shas MK Aryeh Deri** on 23 October 2023 openly declared Israel’s policy of erasing Gaza saying: “We will not remain silent; there is consensus: anyone who participated in or planned the massacre deserves death. . . There will be no more Gaza. Not one activist will enter here from Gaza. There will be no more crossings between Israel and Gaza. Only Rafah to Egypt. . . We made it clear to Biden that Gaza is erased for us. We will not deliver them a crumb, we will never let their workers in . . . Biden was very keen on humanitarian aid; we agreed to transfer certain basic things to the southern part of the Strip only under our conditions. There is agreement with the US and other countries to crush Hamas. . . The goal agreed upon by everyone is that Hamas will not remain in existence — neither politically nor militarily.”³⁶⁸

³⁶³ Limor Son Har-Melech, @limor_sonhrmelh, Tweet (7:55 PM, 10 October 2023), https://x.com/limor_sonhrmelh/status/1711802633655025811.

³⁶⁴ “TRT World Exclusive: Holy Redemption: Stealing Palestinian Land”, *TRT World* (18 September 2024), https://www.youtube.com/watch?v=mF6B5UVupyA&ab_channel=TRTWorld, [52:00 onward].

³⁶⁵ “Knesset Elects Otzma Yehudit MK to JSC, Opposition Leader Gantz calls for Resumption of Talks”, *Market News* (12 July 2023), <https://marketnews.com/knesset-elects-otzma-yehudit-mk-to-jsc-opposition-leader-gantz-calls-for-resumption-of-talks>.

³⁶⁶ “Far-right minister: Nuking Gaza is an option, population should ‘go to Ireland or deserts’”, *The Times of Israel* (5 November 2023), https://www.timesofisrael.com/liveblog_entry/far-right-minister-nuking-gaza-is-an-option-population-should-go-to-ireland-or-deserts/.

³⁶⁷ “MK Yitzhak Kroizer: ‘The Gaza Strip should be wiped off the map’”, *Galei Israel* (5 November 2023), <https://www.gly.co.il/item?id=30587>.

³⁶⁸ Yehuda Schlesinger, “Aryeh Deri: ‘There Was No Plan Ready for the Destruction of Hamas.’”, *Israel Hayom* (23 October 2023), <https://www.israelhayom.co.il/news/politics/article/14742870>.

Incitement to Genocide by Non-Coalition MKs

52. On 16 October 2023, **Yesh Atid MK Meirav Ben-Ari** stated in a televised Knesset session: “[t]here is no symmetry, the children of Gaza have brought it upon themselves!”.³⁶⁹

53. On 4 November 2023, **Yesh Atid Party MK Ram Ben-Barak**, former deputy director of the Mossad and director general of the Ministry of Intelligence Services and the Ministry of Strategic Affairs, stated in an interview on Israeli television, Channel 12: “So, if all of Gaza is refugees, so let’s distribute them around the world. There are 2.5 people there, every country will receive 20,000 people, 100 countries, it’s humane, it’s fitting, they are refugees anyway, it’s better to be a refugee in Canada than a refugee in Gaza. If the world really wants to solve this problem, it can solve it.”³⁷⁰

54. **Leader and founder of the opposition Yisrael Beiteinu Party** and former Deputy Prime Minister and Minister of Foreign Affairs, MK Avigdor Liberman — ‘tweeted’ statements dehumanising Palestinians and inciting the genocide of Palestinians to his 228,000 followers on X, including the following:

- On 30 November 2023, he ‘tweeted’ “there are no innocents in Gaza”,³⁷¹ attracting 2.6 million views.
- On 24 April 2024, he stated in an interview aired on Israeli television that “destroy[ing] half of Gaza” is insufficient — “how we look like even today, is like a bunch of wussies . . . what’s half of Gaza?!”³⁷²

55. **Yisrael Beiteinu MK Yulia Malinovsky** also dehumanised and incited genocide against Palestinians in Gaza, including against children:

- On 29 November 2023, she posted on ‘X’: “There are no uninvolved [civilians] in Gaza!!! The children seen in the pictures rejoicing at our hostages are the next generation of Hamas terrorists”.³⁷³
- On 9 June 2024, she stated that “[t]he magnitude of the problem in Gaza is such that the number of people who are truly uninvolved can be counted on one hand, if at all.”³⁷⁴

Incitement to Genocide by other Government Officials

56. Other government officials have also incited genocide by inciting against UNRWA, seeking to deprive Palestinians in Gaza of the conditions of life essential to their survival, and to attack Palestinian self-determination by seeking to destroy the Palestine Refugee status of Palestinians stemming from Israel’s forcible transfer of Palestinians during the Nakba in 1948:

- On 26 December 2023, **the Permanent Representative of Israel to the United Nations Gilad Erdan** ‘tweeted’: “Hamas=UNRWA & UNRWA=Hamas [UN Secretary-General Antonio Guterres] under your watch UNRWA in Gaza has been hijacked by genocidal terrorists who exploit it every day. Aside from

³⁶⁹ MK Meirav Ben-Ari (Yesh Atid), Knesset Channel, Facebook (16 October 2023), https://www.facebook.com/watch/live/?ref=watch_permalink&v=3497251110531404 [2:30:04].

³⁷⁰ In Context, @incontextmedia, Tweet (6:10pm, 5 November 2023), <https://x.com/incontextmedia/status/1721198184742125817>.

³⁷¹ Avigdor Liberman @AvigdorLiberman, Tweet (8:45 pm, 30 November 2023), <https://twitter.com/AvigdorLiberman/status/1730297081959530685>.

³⁷² MK Avigdor Liberman (Yisrael Beiteinu):B.M., @ireallyhateyou, Tweet (9:38 pm, 13 April 2024), <https://twitter.com/ireallyhateyou/status/1779232781706416404>.

³⁷³ Yulia Malinovsky, @YuliaMalinovsky, Tweet (9:57 pm, 29 November 2023), <https://x.com/YuliaMalinovsky/status/1729952801961193757>.

³⁷⁴ Yulia Malinovsky, @YuliaMalinovsky, Tweet (1:08 pm, 9 June 2024), <https://x.com/YuliaMalinovsky/status/1799760527620477274>.

Hamas, the only body to blame for the situation in Gaza is the UN! UNRWA is an accomplice of Hamas. It's time for the Secretary-General and [UNRWA Commissioner-General Philippe Lazzarini] to shoulder responsibility for the moral rot of UNRWA and UN agencies".³⁷⁵ On 28 January 2024, Gilad Erdan further 'tweeted': "UNRWA is a terror organization and should be held accountable!! For years, we have been calling for the dissolution of UNRWA. Yesterday, it was proven that the UN agency is not only an accomplice of terrorism, but that it also employs despicable terrorists. Yesterday in the GA, I said that the UN failed in its duty to prevent atrocities and is now part of the arsenal of weapons of those who want to destroy Israel and the Jewish people".³⁷⁶

- On 17 April 2024, the **Permanent Representative of Israel** asserted in the Security Council that "[o]ne of the UN's weapons to protract this conflict is UNRWA — "an instrument of war" — whose goal is not aid or education". He accused UNRWA of "creating a sea of Palestinian refugees indoctrinated to believe that 'Israel belongs to them'", that "it is a Palestinian organization, "fully committed to Israel's destruction", and that "[o]ne of its primary goals is to brainwash Palestinian children into believing that the war of 1949 is not over and that they are still refugees 76 years later, even though they were born in Gaza or other countries". Addressing the other State representatives present, he said: "you are providing aspirin to a body contaminated with cancerous cells" . . . Today in Gaza, "UNRWA is Hamas and Hamas is UNRWA" . . . "The time has come to defund UNRWA."³⁷⁷
- On 22 April 2024, on X, a **Spokesperson for the Israeli Ministry of Foreign Affairs, Oren Marmorstein**, attacked the Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, baselessly asserting that it was "not [...] a genuine and thorough review";³⁷⁸ that "Hamis has infiltrated UNRWA so deeply that it is no longer possible to determine where UNRWA ends and where Hamas begins," and reiterating Israel's position that "UNRWA can not be part of the solution in Gaza not now, and not in the future".³⁷⁹ On 24 April 2024, in a press release, Oren Marmorstein reiterated Israel's assertion that "UNRWA is part of the problem and not part of the solution", and that the UNRWA employees that Israel alleges — without apparent substantiation — to be Hamas, are "not just a few bad apples — this is a rotten and poisonous tree".³⁸⁰

Required Urgent Action

57. The above publicly made statements show a steady stream of dehumanisation of Palestinians in Gaza, incitement to genocide and open admissions of genocidal intent. This rhetoric has continued for over a period of over 13 months, and the repeated

³⁷⁵ Ambassador Gilad, @giladerdan1, Tweet (8:57 pm, 26 December 2023), <https://twitter.com/giladerdan1/status/1739722227862430031>.

³⁷⁶ Ambassador Gilad Erdan, @giladerdan1, Tweet (2:23 am, 28 January 2024), <https://twitter.com/giladerdan1/status/1751400645653868924>.

³⁷⁷ Representative of Israel to the UN, in UN Meetings Coverage and Press Releases, '*Insidious Campaign' by Israel Under Way to End Palestine Refugee Agency's Operations in Gaza, Commissioner-General Tells Security Council* (17 April 2024), <https://press.un.org/en/2024/sc15668.doc.htm>.

³⁷⁸ Spokesperson of the Ministry of Foreign Affairs of Israel, Oren Marmorstein, @OrenMarmorstein, Tweet (11:04 pm, 22 April 2024), <https://twitter.com/OrenMarmorstein/status/1782515835640189373>.

³⁷⁹ *Ibid.*

³⁸⁰ Spokesperson of the Ministry of Foreign Affairs of Israel, Oren Marmorstein, @OrenMarmorstein, Tweet (7:16 pm, 24 April 2024), <https://twitter.com/OrenMarmorstein/status/1783183171166646431>. See also Spokesperson of the Ministry of Foreign Affairs of Israel, Oren Marmorstein, @OrenMarmorstein, Tweet (10:35 pm, 5 August 2024), <https://x.com/OrenMarmorstein/status/1820559297895440589>; Spokesperson of the Ministry of Foreign Affairs of Israel, Oren Marmorstein, @OrenMarmorstein, Tweet (7:37AM, 7 August 2024) <https://x.com/OrenMarmorstein/status/1821058154748067856>.

statements by the same individuals demonstrate the total impunity they enjoy and confirms the tolerance for and encouragement of such statements within Israel. Those directly responsible for the conduct of Israel's military in Gaza have repeatedly demonstrated their intent, further evidenced by the destruction of Gaza, and the Israeli military's patterns of attacks (echoed in and implemented on the ground within Gaza) involving killing, depriving the population in Gaza of conditions of life calculated to bring about its destruction, physical and mental harm and prevention of births.³⁸¹ Israel has failed to take any action to stop the dehumanisation of Palestinians and the incitement of genocide against them. In the face of the continued attacks by Israel by which such statements are given effect, it falls to State parties to the Genocide Convention and the international community to take the requisite action to urgently protect Palestinian men, women and children in Gaza after 13 months of Israel's relentless brutal attacks on the territory and its Palestinian population.

³⁸¹ See Forensic Architecture, *A Spatial Analysis of the Israeli Military's Conduct in Gaza since October 2023* (15 October 2024), https://content.forensic-architecture.org/wp-content/uploads/2024/10/FA_A-Spatial-Analysis-of-the-Israeli-militarys-conduct-in-Gaza-since-October-2023.pdf, Appendix, pp. 819-826. See also UNGA, *Report of the Independent International Commission of Inquiry on the Occupied Palestinians Territory, including East Jerusalem, and Israel*, A/79/232 (11 September 2024), <https://undocs.org/A/79/232>, paras. 88-110.

ANNEX II

GENOCIDAL INTENT AND INCITEMENT TO GENOCIDE BY ISRAELI MILITARY OFFICIALS

1. This Annex contains recorded instances of genocidal statements, incitement to genocide and dehumanising rhetoric by Israeli soldiers — including senior military officers in command. The rhetoric often echoes genocidal statements and themes by senior Israeli governmental officials, calling for the destruction of Gaza, a second ‘Nakba’, and the full Israeli occupation of Gaza. Further, soldiers directly responsible for operating lethal weaponry against Palestinians in Gaza, or in command of soldiers who operate such weaponry, repeatedly assert that there are no innocent or ‘uninvolved’ Palestinians in Gaza, and echo the words of the Israeli Prime Minister, calling for the annihilation of the Palestinian ‘Amalek’.
2. Such statements — alongside numerous photographs and ‘snuff’-like videos posted on social media by them from Gaza¹ — provide a clear and unambiguous insight into the motivations and mindset of Israeli commanding officers, and Israeli soldiers in Gaza. Together with the statements from Israeli Ministers and other senior public officials outlined in Annex I, they demonstrate that the commission of acts of genocide within the scope of Article II of the Genocide Convention is conducted with the requisite genocidal intent, as well as further demonstrate other violations of international humanitarian and criminal law.
3. Videos and statements of soldiers recording themselves destroying Palestinian property and civilian infrastructure, blowing up and setting fire to Palestinian homes, while sharing dehumanising and genocidal messages, also provide a visual and documentary record of Israeli soldiers’ practical interpretation of the Israeli government overall policy and intention towards Palestinians in Gaza, and their practical application of their orders, their rules of engagement and their weaponisation of fundamental concepts of international humanitarian law against the Palestinian people. The ever-mounting death toll in Gaza — the majority of which comprises women and children — the extreme levels of mental and bodily harm caused to Palestinian civilians, and the widespread destruction of Gaza itself, further underscore the destructive intent demonstrated by these statements. Indeed, commentators suggest that “[w]hat is photographed and distributed is” believed to be “only the tip of the iceberg”, with the “vast majority of offenses” being “committed beyond the range of the cameras”.² What *is* documented however reflects the clear prevailing sense of impunity amongst Israeli officers and soldiers who unashamedly continue to post such statements, videos and photographs on social media, without fear of any significant punishment. Where soldiers are chastised, statements by senior officers indicate that the reason for any action is for not following bureaucratic processes,³ or for improperly posting photos or videos⁴ — not the underlying act.

¹ “Genocide in Gaza through the eyes of Israeli soldiers | The Listening Post”, *Al Jazeera English* (3 March 2024), <https://www.youtube.com/watch?v=JAT9NQ4WkE0>; “What Israeli Soldiers’ Videos Reveal: Cheering Destruction and Mocking Gazans”, *New York Times* (6 February 2024), <https://www.nytimes.com/2024/02/06/world/middleeast/israel-idf-soldiers-war-social-media-video.html>; *South Africa v. Israel, Verbatim Record 2024/1* (11 January 2024), <https://www.icj-cij.org/sites/default/files/case-related/192/192-20240111-ora-01-00-bi.pdf>, p. 36, para. 22: “There is now a trend among the soldiers to film themselves committing atrocities against civilians in Gaza, in a form of ‘snuff’ video.”

² Amos Harel, “ICJ Ruling Won’t Immediately Change War in Gaza, but Danger Still Looms for Israel”, *Haaretz* (26 May 2024), <https://www.haaretz.com/israel-news/2024-05-26/ty-article/.premium/rafah-operation-advances-as-israel-faces-added-pressure-by-icj-ruling-to-end-the-war/0000018f-b179-dfc6-a3ef-b57daa210000>.

³ See, e.g., Emanuel Fabian, “Senior IDF officer censured over demolition of Gaza university without approval”, *The Times of Israel* (11 March 2024), <https://www.timesofisrael.com/senior-idf-officer-censured-over-demolition-of-gaza-university-without-approval/>.

⁴ Merlyn Thomas & Jamie Ryan, “Israeli soldier videos from Gaza could breach international law, experts say”, *BBC* (9 February 2024), <https://www.bbc.co.uk/news/world-middle-east-68249962> (in response to a photo of a severely injured, naked, Palestinian detainee: “The suspect was not injured. A reservist photographed and published the picture contrary to IDF orders and values.”).

4. A non-exhaustive selection of genocidal statements — organised by rank in each section — and materials recorded by Israeli officers and soldiers in Gaza, or pertaining to Palestinians in Gaza, and appearing in the public domain, is set out below.

Statements of the Chief of Staff and other Generals of the Israeli Military

5. Generals of the Israeli military have participated in creating a context ripe for incitement to genocide, have incited genocide, and have made various calls and admissions evidencing the underlying genocidal intent informing the Israeli military's assault on Gaza and the part of the Palestinian group in Gaza. The latter is especially evident from how these statements reflect the same themes and use the same language as those statements of senior Government officials of Israel,⁵ and how these statements are in turn echoed by lower ranking officers and soldiers in Gaza.

- On 10 October 2023, in a video statement addressed directly to those in Gaza, and published on an Israeli army official channel, **Israeli Army Coordinator of Government Activities in the Territories ('COGAT'), Major General Ghassan Alian** — also a member of Israel's General Staff, the military's supreme command structure — warned " Hamas became ISIS and the citizens of Gaza are celebrating instead of being horrified. Human animals are dealt with accordingly. Israel has imposed a total blockade on Gaza, no electricity, no water, just damage. You wanted hell, you will get hell".⁶
- On 12 October 2023, **Lieutenant General Herzl Halevi** — the Chief of the General Staff of the Israeli army — who heads the supreme command level of the Israeli military,⁷ and who is an illegal settler in the West Bank,⁸ in a public address to the nation, stated that "The fighting spirit of the IDF strikes Gaza with full force, and we will not stop there. It [the IDF's fighting spirit] has decisiveness, it has fury . . . We will reach a position where those who led Gaza will be struck intensely, we will take them apart. And whoever remains there will understand well that no such thing is to be done to the State of Israel".⁹
- On 30 March 2024, **Lieutenant General Herzl Halevi** commended the Israeli army's attack on Al Shifa hospital as "very high achievements",¹⁰ notwithstanding eye-witnesses reports of staff and patients enduring "horrific levels of violence".¹¹ As a result of Israel's siege on the hospital, 21 patients were killed.¹² Mass shallow graves were found at the hospital on the Israeli army's withdrawal, containing hundreds of bodies, including hospital patients

⁵ See Annex I.

⁶ Video address by Major General Ghassan Alian, "COGAT head, Maj Gen Ghassan Alian speaking to Hamas and the residents of Gaza: #ISrael_under_attack", @COGAT-MOD (10 October 2023), <https://www.youtube.com/shorts/5a0EWv-o7mE> [Arabic], The provided translation is by COGAT. However, South Africa also obtained its own independent translation: "Kidnapping, torturing, murdering and abusing children, women and elderly isn't human at all. There is no justification for such an act. Hamas became ISIS. Instead of being shocked by this, the Gaza residents are celebrating. With such human beasts, we'll deal accordingly. Israel has imposed a total blockade on Gaza. You'll not have electricity and no water. Only destruction. You want hell, you'll get hell."

⁷ Israel, *Basic Law: The Army* (1976), <https://www.jewishvirtuallibrary.org/basic-law-the-army>.

⁸ Emanuel Fabian, "Herzi Halevi formally takes over as chief of staff, vows to keep politics out of IDF", *The Times of Israel* (16 January 2023), <https://www.timesofisrael.com/herzi-halevi-becomes-idf-23rd-chief-of-staff-in-handover-ceremony/>.

⁹ Israel Defense Forces, @IDF, Tweet (6:23 pm, 12 October 2023), <https://x.com/IDF/status/1712504294279168307>.

¹⁰ Kann News, @kann_news, Tweet (6:55 pm, 30 March 2024), https://twitter.com/kann_news/status/1774118267734434074.

¹¹ UN News, *Gaza: Israeli strike on NGO aid team condemned as humanitarians renew access call* (2 April 2024), <https://news.un.org/en/story/2024/04/1148161>.

¹² Médecins Sans Frontières, *Gaza: Israeli forces leave Al-Shifa Hospital in ruins* (2 April 2024), <https://www.doctorswithoutborders.ca/gaza-israeli-forces-leave-al-shifa-hospital-in-ruins/>. See also UN News, *Gaza: Israeli strike on NGO aid team condemned as humanitarians renew access call* (2 April 2024), <https://news.un.org/en/story/2024/04/1148161>; Tedros Adhanom Ghebreyesus, @DrTedros, Tweet, (10:56 pm, 31 March 2024), <https://x.com/DrTedros/status/1774541424391848057>.

with cannulas in their arms, and others with limbs tied.¹³ The hospital — the largest centre of medical learning and expertise in Gaza — older than Israel itself,¹⁴ was completely destroyed by the Israeli army, leaving it in ruins and placed permanently out of service.¹⁵

- On 13 October 2023, **Reserve Major General Yair Golan** was quoted by the Israeli press as stating that “They should be told: listen, until they [the hostages] are not released, from our side you will starve to death. This is totally legitimate”.¹⁶
- On 27 October 2023, **Brigadier General Harel Knfao**, who currently heads the Israeli Military’s ‘Information Operation’ of the Southern Command,¹⁷ stated: “Occupy Gaza. Kick out all Gazans to every possible place in the world and build a villa by the sea [in Gaza] for every family that has lost their loved ones.”¹⁸
- On 28 October 2023 — on the same day that the Israeli Prime Minister invoked the Biblical annihilation of the Amalek — **Brigadier General David (“Dado”) Bar Kalifa, commanding the 36th Armoured Division in Gaza**¹⁹ — issued a letter to Israeli soldiers that were about to invade Gaza, exhorting them to battle, stating: “What has been will be no more! We shall go out to it in war, we shall pulverize every accursed plot of land from which it came, we shall destroy it and the memory of it . . . and we shall not return until it is annihilated. . .”. Quoting the Hebrew Bible, he urged Israeli soldiers to “avenge the blood of His servants, wreak vengeance on His foes, and cleanse the land of His people [Deuteronomy 32:43]” stating “This is our war, today is our turn. Here we are!”.²⁰
- On 4 November 2023, in a video filmed in Beit Lahia — one of the first areas of Gaza to have been devastated by the Israeli army²¹ — and broadcast on Israeli television, **Brigadier General and Deputy Defence Establishment Comptroller of the Israeli army, Yogev Bar-Sheshet**, who accompanied forces in Gaza,²² warned “that’s our message. Nothing is left. Whoever returns

¹³ UN News, *Mass graves in Gaza show victims’ hands were tied, says UN rights office* (23 April 2024), <https://news.un.org/en/story/2024/04/1148876>. See Aya Batrawy, “One man’s search for his father in mass graves at Gaza’s Al Shifa hospital”, *NPR* (April 18, 2024), <https://www.npr.org/2024/04/18/1245654891/one-mans-search-for-his-father-in-mass-graves-at-gazas-al-shifa-hospital>.

¹⁴ Lorraine Mallinder, “Why is Gaza’s al-Shifa hospital at the heart of Israel’s war?”, *Al Jazeera* (8 November 2023), <https://www.aljazeera.com/news/2023/11/8/why-is-gazas-al-shifa-hospital-at-the-heart-of-israels-war>.

¹⁵ WHO, *Six months of war leave Al-Shifa hospital in ruins, WHO mission reports* (6 April 2024), <https://www.who.int/news/item/06-04-2024-six-months-of-war-leave-al-shifa-hospital-in-ruins--who-mission-reports>; UN News, *Gaza: ‘Systematic dismantling of healthcare must end’ says WHO* (6 April 2024), <https://news.un.org/en/story/2024/04/1148316>.

¹⁶ Ra’anan Shaked, “‘For Many Years I’ve Been Viewed as a ‘Treasonous Leftist’. No One Can Say to Me: You Stayed on the Fence. We Didn’t Stay. We Went to Fight’”, *Ynet* (13 October 2023), <https://www.ynet.co.il/news/article/yokra13625242>.

¹⁷ Israel’s Defence & Security Forum, *Brigadier General (Res.) Harel Knfao*, <https://idsf.org.il/en/team-members/brigadier-general-res-harel-cnafo/>.

¹⁸ Brig. Gen. Harel Knfao, Facebook (27 October 2023), https://www.facebook.com/permalink.php?story_fbid=pfbid02j6SoXDPLfwZXecqm2JSY4vKLXrMSX5zNivZmvsC4cNHMZQ57AnM74RVgjYDHcS3bl&id=1239425657, also available at Younis Tirawi, @ytirawi, Tweet (1:32 pm, 28 June 2024), <https://x.com/ytirawi/status/1806651825140990085>.

¹⁹ Yossi Yehoshua and Reuven Weiss, “Brigadier General Dado Bar Khalifa: ‘In Gaza we were a herd of elephants that left behind ruins’”, *Ynet* (19 April 2024), <https://www.ynet.co.il/news/article/yokra13889198>; Emanuel Fabian, “IDF details heavy battles between its 36th Division and Hamas, in Gaza City’s Zeitoun neighborhood”, *The Times of Israel* (20 November 2023), https://www.timesofisrael.com/liveblog_entry/idf-details-heavy-battles-between-its-36th-division-and-hamas-in-gaza-citys-zeitoun-neighborhood/.

²⁰ Yoav Zeitoun, “The divisioneer’s letter to the fighters: ‘The enemy who asked for hell, will receive hell’”, *Ynet* (29 October 2023), <https://www.ynet.co.il/news/article/b1tj8tozt>. See also partial translation available at Uri Misgav, “Opinion | Israel, Beware: In War, Apocalyptic Jewish Ultra-nationalists are in a State of Ecstasy”, *Haaretz* (2 November 2023), <https://www.haaretz.com/opinion/2023-11-02/ty-article-opinion/.premium/israel-beware-nationalist-haredis-are-in-a-state-of-ecstasy/0000018b-8c23-d7a8-afcf-aea34fd90000>.

²¹ See e.g., Dominic Bailey, Erwan Rivault and Daniele Palumbo, “Nearly 100,000 Gaza buildings may be damaged, satellite images show”, *BBC* (1 December 2023), <https://www.bbc.com/news/world-middle-east-67565872>.

²² Yoav Zeyton, “Released: Brigadier General Yogev Bar Shashet was moderately injured by shrapnel from gunfire on Friday in Zeyton”, *Ynet* (12 May 2024), <https://www.ynet.co.il/news/article/hyakcb0f0>.

here, if they return here afterwards, will see scorched earth here. No houses, no agriculture, no nothing. They have no future".²³

- In November 2023 **then-Colonel Elad Goren, who was since promoted to Brigadier General (August 2024) and made "Head of the Humanitarian-Civilian Effort" of Israel in Gaza, under the authority of COGAT,**²⁴ reportedly stated: " Hamas wants you to think there is a humanitarian crisis in Gaza in order to get a ceasefire. But it won't happen. Israel will continue [its] military activity while making an effort to harm as few uninvolved civilians as possible. At the same time, it is worth remembering that thousands of Gazans took part in the massacre on October 7 and not just Hamas members".²⁵
- In November 2024, in a press briefing by the Israeli Military **Brigadier General Itzik Cohen, Commander of the Israeli Military's 162 Division fighting in Gaza,** declared that aid would no longer enter North Gaza, that there are "no more civilians left" and that "there is no intention of allowing the residents of the northern Gaza Strip to return to their homes".²⁶
- In early December 2024, **Brigadier General Yehuda Vach, Commander of the Israeli Military's 252nd Division fighting in Gaza,** was reported to have told his officers that "Only by losing land will the Palestinians learn the necessary lesson from the massacre Hamas perpetrated in southern Israel on October 7". The Brigadier General had previously advocated with his Officers that not one aid truck should enter Gaza, and that — as a matter of operational doctrine — there are "no innocents" in Gaza.²⁷

Dehumanising Statements by Israeli Soldiers and Assertions that there are 'No Innocents' or 'No Uninvolved' in Gaza

6. Israeli officers and soldiers routinely identify the *entire* Palestinian population of Gaza as the enemy, blaming them for the actions of Hamas and other armed groups on 7 October 2023,²⁸ calling all Palestinians in Gaza 'human animals', 'sons of Satan', 'terrorists',²⁹ or supporters; and at times also extending such calls to all member of the

²³ "Segment from 'Special documentation from the heart of Gaza: this is how our forces fight deep in enemy territory'", *Hallel Biton Rosen* (4 November 2023), <https://www.youtube.com/watch?v=fqEj3DzadiM>, [4:11]: See Elhanan Mazuz, "Special documentation from the heart of Gaza: this is how our forces fight deep in enemy territory", *Now 14* (5 November 2023), <https://www.now14.co.il/נלחמים-כוחותינו-כך-עזה-מלב-מיוחד-תיעוד/>.

²⁴ Emanuel Fabian, "IDF taps high-ranking officer for new humanitarian liaison role in Gaza", *The Times of Israel* (28 August 2024), https://www.timesofisrael.com/liveblog_entry/idf-taps-high-ranking-officer-for-new-humanitarian-liaison-role-in-gaza/; "Chief of Staff Herzl Halevi appoints Elad Goren as new Head of Humanitarian-Civilian effort in Gaza", *Jerusalem Post* (28 August 2024), <https://www.jpost.com/breaking-news/article-816729>.

²⁵ Ariel Kahana, "IDF reveals: 'Hamas decides which medical equipment will be taken to its terrorists and which will be sent to hospitals'", *Israel Hayom* (7 November 2024), <https://www.israelhayom.co.il/news/defense/article/14795788>.

²⁶ Bethan McKernan and William Christou, "Palestinians will not be allowed to return to homes in northern Gaza, says IDF", *The Guardian* (6 November 2024), <https://www.theguardian.com/world/2024/nov/06/palestinians-will-not-be-allowed-to-return-to-homes-in-northern-gaza-says-idf>; Drop Site, @DropSiteNews, Tweet (5:06 am, 26 October 2024), <https://x.com/DropSiteNews/status/1850011191281652154>. See also <https://www.kan.org.il/content/kan-news/defense/820691/>: "The IDF estimates that only thousands of people remain in the central focal points in the northern Gaza Strip: between 1,000 and 3,000 in Beit Lahia and 1,000 in Jabaliya. The IDF says that after entering Jabaliya twice in the past, this time there is no intention of allowing the residents of the northern Gaza Strip to return to their homes and that Humanitarian aid will regularly enter the south of the Gaza Strip — since there are no more civilians left north of Gaza City. Senior IDF officials were asked if there is a decision to split the northern Gaza Strip into two parts, Gaza City and the northern neighborhoods, and they answered that the decision is to cut off the northern Gaza Strip from Gaza City."

²⁷ Yaniv Kubovich, "'Flatten' Gaza, Halt Aid: The Division Commander Overseeing Gaza's Brutal Netzarim Corridor", *Haaretz* (1 January 2025), <https://www.haaretz.com/israel-news/2025-01-01/ty-article-magazine/.premium/flatten-gaza-halt-aid-the-commander-overseeing-gazas-brutal-netzarim-corridor/00000194-223e-da14-adb7-767eb9790000>.

²⁸ See Annex I: STATEMENTS EVIDENCING GENOCIDAL INTENT AND INCITEMENT TO GENOCIDE BY SENIOR ISRAELI GOVERNMENTAL OFFICIALS.

²⁹ See also e.g. International Committee of the Red Cross, *Geneva Conventions: humanity must prevail!* (12 August 2024), <https://www.icrc.org/en/article/geneva-conventions-humanity-must-prevail>: "the deliberate dehumanization of the enemy through labels such as 'terrorist'".

wider Palestinian group beyond Gaza. Such characterisations serve to legitimise the extermination and killing of Palestinian men, women and children; the effect is demonstrated by the sheer number of Palestinian deaths and injuries and the vast destruction of Palestinian infrastructure. In denying that there are any innocent people in Gaza, Israeli officers and combat soldiers echo statements of Israeli officials, including those of Israeli President Isaac Herzog, cited by the International Court of Justice in its January Order, that “[i]t is not true this rhetoric about civilians not aware, not involved”.³⁰ The below statements and footage make clear that, notwithstanding attempts by the Israeli President to disclaim the geocidal nature of his rhetoric in the context of South Africa’s case against Israel in the International Court of Justice,³¹ the genocidal meaning of his statement — and of other statements by senior Israeli political and military officials — were understood and put into practice by Israeli officers and soldiers on the ground in Gaza. By way of illustrative examples:

- On 20 November 2023, **Colonel and Rabbi Tsachi Fenton**,³² who served in Gaza,³³ stated, “There are no ‘uninvolved’”.³⁴ On 27 February 2024, the Colonel posted on his Instagram profile: “[T]he Palestinians are infidels. Terrorists.”³⁵
- In October 2023, **Lieutenant Colonel Tal Bibi, senior officer and Commander in the Nahal Brigade**, posted that “This is deep in the DNA of all of Gaza Strip’s population !!!!! ... Gaza must be erased!!!! ... The evil is deep deep down inside everyone there!!!”.³⁶
- In October 2023, statements from **Lieutenant Colonel Tal Torn** indicate the clear link between the dehumanisation of all Palestinians in Gaza, and the incitement to genocide and presence of genocidal intent. For example, on 8 October 2023 he posted on Facebook “Human animals. Unbelievable. Wipe out Gaza now!”.³⁷
- On 13 October 2023, **Lieutenant Colonel David Levi** — who also lectures junior officers³⁸ — posted on one of his social media accounts his dehumanising

³⁰ *South Africa v. Israel, Order of 26 January 2024*, <https://www.icj-cij.org/sites/default/files/case-related/192/192-20240126-ord-01-00-en.pdf>, pp. 17 – 18, para. 52: “We are working, operating militarily according to rules of international law. Unequivocally. It is an entire nation out there that is responsible. It is not true this rhetoric about civilians not aware, not involved. It is absolutely not true. They could have risen up. They could have fought against that evil regime which took over Gaza in a coup d’état. But we are at war. We are at war. We are at war. We are defending our homes. We are protecting our homes. That’s the truth. And when a nation protects its home, it fights. And we will fight until we’ll break their backbone.” See also *South Africa v. Israel, Application instituting proceedings and request for the indication of provisional measures of 29 December 2023*, <https://www.icj-cij.org/sites/default/files/case-related/192/192-20231228-app-01-00-en.pdf>, p. 60, para. 101.

³¹ Isaac Herzog, “The Case Against Israel Rests on Lies: Among them is a quote of mine that South Africa grossly distorted in its presentation to the ICJ”, *Wall Street Journal* (11 February 2024), <https://www.wsj.com/articles/the-case-against-israel-rests-on-lies-the-hague-south-africa-genocide-gaza-bc7c264c>. See also Israeli Ministry of Foreign Affairs, *President Herzog addresses ICJ Ruling* (28 January 2024), <https://www.gov.il/en/departments/news/president-herzog-addresses-icj-ruling-28-jan-2024>; and in Hebrew: Israeli President, *The President’s remarks at the Bible Circle in memory of 929 CEO Moshe Ohion and his son Eliad* (28 January 2024), [https://www.president.gov.il/דברי-הנשיא-בחוץ-הגן-לזכרו-של-מנכ"ל-929-משה](https://www.president.gov.il/דברי-הנשיא-בחוץ-הגן-לזכרו-של-מנכ).

³² See e.g., Ohad Merlin, “How to explain Israel’s narrative in the Gaza war to Arab media”, *Jerusalem Post* (1 March 2024), <https://www.jpost.com/israel-hamas-war/article-789623>.

³³ Col. Tsachi Fenton, Facebook (20 March 2024), <https://www.facebook.com/tsachi.fenton/posts/pfbid0JaThX8jM3TRyfASdJTYMZBehp36EEbcXJGCyn45oFSiTHXxn9jhnnon22FMnWQUjl>.

³⁴ Younis Tirawi, @ytirawi, Tweet (12:33 pm, 9 June 2024), <https://x.com/ytirawi/status/1799751775639204093>.

³⁵ Col. Tsachi Fenton, @tsachi_f, Instagram Post (27 February 2024), <https://www.instagram.com/p/C32sikygAKd/>, also available at Younis Tirawi, @ytirawi, Tweet (12:59 pm, 9 June 2024), <https://x.com/ytirawi/status/1799758232371798277>.

³⁶ Lt. Col. Tal Bibi, Facebook (27 October 2023), <https://www.facebook.com/talbibi1/posts/pfbid0kSBni6RugVXe8pVbSux8ZomRJy3nVZBBFQCmsmZhs15wuvsd2rGDjNuBbQq4EF52I>, also available at Younis Tirawi, @ytirawi, Tweet (8:31 pm, 27 May 2024), <https://x.com/ytirawi/status/1795160918726201702>.

³⁷ Lt. Col. Tal Torn, Facebook (8 October 2023), https://www.facebook.com/permalink.php?story_fbid=pfbid0jAoyxC5UqpqZ3gjDkVKWbMS5rsYtXy2WxebBqkwkH6xCqdTF3i96bDU1JfPpCyYdl&id=100007495568299, also available at Younis Tirawi, @ytirawi, Tweet (12:01 pm, 30 May 2024), <https://x.com/ytirawi/status/1796119803200946376>, also available at <https://archive.ph/viU5d>.

³⁸ See e.g.: Lt. Col. David Levi, @kingdavid191, Instagram Post (22 July 2024), <https://www.instagram.com/p/C9u-xIHMO1f/>, and Lt. Col. David Levi, @kingdavid191, Instagram Post (8 March 2024), <https://www.instagram.com/p/C4Q69tJsHGe/>.

characterisation of all members of the Palestinian group: “The Arabs who are called by historical lie ‘Palestinians’ and who live in the regions of the homeland in Judea, Benjamin, Samaria and Gaza are sons of Satan and there will be no peace with them.”³⁹ On 31 March 2024, he further remarked that “[E]very Arab is a suspicious object!!!”⁴⁰ The Lieutenant Colonel also made various statements demonstrating the clear link between finding no one innocent and uninvolved and calling for the total annihilation of Gaza. On 21 October 2023, he stated:

“Israel will rise! Anyone who saw the sights, the eruption of the Arabs’ unadulterated evil[,] knows that the people of Israel will rise because they have no other choice. Anyone who saw the sights now knows for certain that the conflict with them, with the Arabs, is over our essential existence here in Eretz Yisrael [the land of Israel] and is not a matter of territory or of ‘48/’67 lines or any other border. Anyone who witnessed the Arabs’ unadulterated evil words towards the people of Israel knows that the answer to the Arabs must be total extermination of Gaza and all two-legged animals there. Nothing will bring comfort... And still we demand revenge under the clear assumption that there is not one innocent person in Gaza... Each one of them is an object of suspicion that should be reacted to only with fire and pillars of smoke. We will win, God willing.”⁴¹

- On 16 December 2023, **Lieutenant Colonel David Levi** posted: “Over 70 days have passed... We must not forget or let the memory fade.. Gaza should be obliterated... There are no innocents in Gaza and therefore they are all targets!”.⁴² On 19 December 2023, he stated: “Gaza is Hamas and there are no uninvolved in there... Everyone is involved. Everyone is a target! Everywhere! No Arab falsely known as “Palestinian” will be safe and we will reach you, kill you because a yearning Israeli and Jewish soul is worth more than enemies of humanity like you. Gaza is Hamas and Gaza will be destroyed! . . . ”.⁴³ On 18 April he posted on Facebook: “We mustn’t forget today... What happened on Simchat Torah , the hostages are still in Gaza... Gaza must undergo deconstruction and destruction mercilessly and emotionlessly. There are no innocents in Gaza!”.⁴⁴
- On 17 November 2023, **Lieutenant Colonel Yair Maen** posted: “Meet our neighbours. It’s true that not all of them participated in the massacre but almost all of them support the terrible acts that were committed [.] An overwhelming majority of the innocent Palestinian civilians living in Gaza and Judaea and Samaria support the pogrom of October 7th . . . All with a smile and with joy[,] zero humanity[.] And that is what the majority of Palestinian residents in Gaza and Judea and Samaria support. We will not forget nor forgive the cursed murderers and their people who support their heinous acts. Am Yisrael Chai [The People of Israel Live]”.⁴⁵
- On 29 November 2023, **Lieutenant Colonel Haim Har-Zahav**, commenting on 7 October 2023, urged for the further characterisation of all Palestinians in Gaza as human animals, stating: “We cannot have compassion [or: pity] towards the civilians of Gaza they are human animals like Hamas”.⁴⁶

³⁹ Lt. Col. David Levi, @kingdavid191, Instagram Post (24 May 2024), <https://www.instagram.com/p/C7WekojsTep/>, also available at Younis Tirawi, @ytirawi, Tweet (7:26 am, 19 June 2024), <https://x.com/ytirawi/status/1803298188553548280>.

⁴⁰ Younis Tirawi, @ytirawi, Tweet (7:53 am, 19 June 2024) <https://x.com/ytirawi/status/1803305015672545634>.

⁴¹ Younis Tirawi, @ytirawi, Tweet (7:32 am, 19 June 2024), <https://x.com/ytirawi/status/1803299870909825289>.

⁴² Younis Tirawi, @ytirawi, Tweet (7:49 am, 19 June 2024), <https://x.com/ytirawi/status/1803304107614011612>.

⁴³ Younis Tirawi, @ytirawi, Tweet (7:49 am, 19 June 2024), <https://x.com/ytirawi/status/1803304107614011612>.

⁴⁴ Younis Tirawi, @ytirawi, Tweet (7:55 am, 19 June 2024), <https://x.com/ytirawi/status/1803305687931314238>.

⁴⁵ Younis Tirawi, @ytirawi, Tweet (12:31 pm, 30 May 2024), <https://x.com/ytirawi/status/1796127208601268732>.

⁴⁶ Lt. Col. Haim Har-Zahav, Facebook (29 November 2023), https://www.facebook.com/permalink.php?story_fbid=pfbid0SM8SHGCGJkpmM8mPTxZrrgxAMKb6XVcLQRurgVF7C9pJJPBjsRLNVWDh3DU7goS4l&id=100002310278578, also available at Younis Tirawi, @ytirawi, Tweet (11:51 am, 7 June 2024), <https://x.com/ytirawi/status/1799016314561794472>.

- On 7 January 2024, **Lieutenant Colonel Shauli Sanker**, who fought in Gaza,⁴⁷ stated “Shame. Letting humanitarian aid to the Gaza Strip is simply a crime. Whoever is taking part in it is guilty. Whoever is taking part of it did not fully internalize 7.10 . . . The use of the term ‘uninvolved’ is simply madness. They have eyes but cannot see [Psalms 115]. A Population that supports a terrorist organization is all guilty. The same is valid for Judea and Samaria . . . ”.⁴⁸
- On 17 April 2024, **Lieutenant Colonel Maoz Shwartz**, who fought in Gaza,⁴⁹ commented on photographs showing displaced Palestinians — including children — cooling down in the Palestinian sea off Gaza in the midst of a 40° Celsius heatwave, stating: “Where is the lifeguard? (ours, not theirs) How much it saddens me to know that a few months ago we were in the area of this beach with our battalion. It was clear that this is a war. A war in Gaza. In all of Gaza! There was no confusion and why? Because all Gaza is one big terrorism including the bathers on the beach there in the picture . . . Besides, a bit of healthy national logic! They’re at the beach and our hostages are wasting away in captivity?? Let them choke! No sea [.]. No swimming pool [.]. Nothing! Let them surrender! . . . ”.⁵⁰
- On 5 July 2024, **Lieutenant Colonel Itamar Eitam**, who fought in Gaza,⁵¹ said in an interview, in reference to Palestinians in Gaza, “[some people want] the responsible adult to force us to sit and talk, and then a solution to the conflict will be found, that is very optimistic. It gives people hope, some solace, saying we are all good people that want to live in peace and quiet. That is not true! The Gazans I met do not want to live in peace and quiet, they don’t just want their child to go to university, and they’re... they’re evil . . . And it’s hard for us to grasp that there’s evil in the world”.⁵²
- On 5 November 2023, **Major Hagar Amar**, in a post on Facebook, responded to a public figure in Israel proposing to “[b]ring the good Gazan residents to the Israeli Negev until the end of the war”, by stating *inter alia*: “. . . And the children who are there??? The children grow up to be shahids [martyrs], not normal people. No mercy. They are all destined to die. Am Yisrael Chai”.⁵³
- On 6 January 2024, **Major Asaf Fried**, who served in Gaza,⁵⁴ posted on Facebook: “. . . Wake up from 6.10 already. There is no such thing as ‘good Arabs’. Everyone

⁴⁷ Lt. Col. Shauli Sanker, Facebook (26 July 2024), <https://www.facebook.com/shauli.sanker.1/posts/pfbid02XRPRP8Z86Yifdoy6oQkrMuxP2r7vL5tJupjoy7Zo9JhQLD1ZQ5U8gkdZm8hra6vY1>.

⁴⁸ Lt. Col. Shauli Sanker, Facebook (7 January 2024), <https://www.facebook.com/shauli.sanker.1/posts/pfbid02D2nScN6d8pju9gxRdtVPvQiaXrWvMntyE3o6Kxng24mrVG7pyvPwu86fqatUiJiul>, also available at Younis Tirawi, @ytirawi, Tweet (9:43 pm, 4 June 2024), <https://x.com/ytirawi/status/1798078038426689766>.

⁴⁹ Maoz Shwartz, “It’s not just imperative to win; it’s possible to win – there is no alternative!”, *Israel War Database*, <https://www.warinisrael.org/stories-of-valor-1/maoz-schwartz>.

⁵⁰ Lt. Col. Maoz Shwartz, Facebook (17 April 2024), https://www.facebook.com/permalink.php?story_fbid=pfbid0DNRDkRkNyouT6C8qPPFDvoQDWtFxcJxgm3o4bLh27lsUuyXob2crbcDpfyTEJDAKl&id=100010376056432. See Younis Tirawi, @ytirawi, Tweet (10:14 am, 18 April 2024), <https://twitter.com/ytirawi/status/1780872452471452047>. See “In the picture: Battalion 7007 in Jabaliah defeats the enemy in its sector”, Lt. Col. Maoz Shwartz, Facebook (16 January 2024), https://www.facebook.com/permalink.php?story_fbid=pfbid02LpnJYWQNKdXaCUFufeYVG3yWXqr6u8B3jx548Haa1ZPmJLxYrQxbefgEpBf24Hccl&id=100010376056432.

⁵¹ Yoav Zitun, “Reserve battalion commander injured in Jabaliya: ‘I’m okay, pray for my soldier’”, *Ynet* (26 May 2024), <https://www.ynetnews.com/article/sykwg5xnc>.

⁵² “Itamar Eitam in an interview: We let Hamas establish a State in Gaza, we treat the conflict as if it were Sesame Street”, *Breaking walls channel* (7 July 2024), <https://www.youtube.com/watch?v=KMF6HbLO-xc>, also available at Younis Tirawi, @ytirawi, Tweet (9:37 pm, 5 July 2024), <https://x.com/ytirawi/status/1809310730522628313>.

⁵³ Maj. Hagar Amar, Facebook (5 November 2023), <https://www.facebook.com/hagar.amar.5/posts/pfbid0KaJNLGQvxpZnfvyffugyMqgj1EKDx9EuR83xezErHmwzv68knZK5DQpE6iKkE9fCl>, available at Younis Tirawi, @ytirawi, Tweet (9:58 pm, 8 June 2024), <https://x.com/ytirawi/status/1799531499735117847>.

⁵⁴ See Maj. Asaf Fried, Facebook (9 June 2024), https://www.facebook.com/permalink.php?story_fbid=pfbid02fY9QECVZnTrWinmLU3oqx4y7hLHHyrkXj18PFxwTQvKgu5v3yQg3sAJnCoW4efpBl&id=100000183658777: “Rafah Crossing says hi”, also available at Younis Tirawi, @ytirawi, Tweet (10:03 pm, 9 June 2024), <https://x.com/ytirawi/status/1799910174691655747>.

celebrated on 7.10 they are all [the] enemy. And I hope you know what [we] do with enemies. . .”.⁵⁵ On 3 July 2024, after rumours⁵⁶ — later proven false⁵⁷ — that Israel’s State Attorney Amit Aisman had requested Israel’s Attorney-General Baharav-Miara to open a criminal investigation into Minister of National Security Ben-Gvir for incitement against residents of Gaza, Major Fried posted on Facebook: “In Gaza, everyone is a terrorist. (Aisman, interrogate me)”.⁵⁸

- On 25 March 2024, **Major Ilan Arad** posted on Facebook, calling every Palestinian in Gaza a “son[...] of Satan” and expressing the associated desire for their suffering and extermination by depriving them of conditions of life: “I admit I’m a bit shocked after reading this week that an international initiative is supposed to build a seaport in Gaza with Qatari funding . . . the hypocritical world thinks it’s going to give the Gazan monsters a kind of ‘reward’ for their sexual crimes, beheadings, and murders . . . truly moving . . . [a]ll the people of Gaza, whether they committed the atrocities or cheered for the rapists and murderers in the streets of the strip, will pay the most painful price on earth. No international seaport funded by foreign aid will be built in Gaza, and no humanitarian aid will be extended to the sons of Satan who initiated, supported, carried out, and cheered the monsters of Satan on the darkest day that has befallen our people to date. The fate of the Gazan sons of Satan is sealed and will be carried out like the judgment on the Nazis and their aides, and as part of the punishment, the city of Gaza will be destroyed to its foundations, and the Gaza Strip will become forever Israeli . . .”.⁵⁹
- On 17 April 2024, **Major Yaniv Benami, a commander in an infantry corps who fought in Gaza**, stated, “There are no uninjured in Gaza”.⁶⁰ On 6 October 2024, he posted, “Anyone who saw the Channel 12 broadcast about 7.10 understands that there are no, absolutely no innocent [people] in Gaza! And it will not be over until there will be no Gaza here it will simply be evacuated from here and then there will be no Gaza Envelope by definition [...] Otherwise we’ve done nothing”.⁶¹
- On 16 July 2024, a video was published of **Major in the Israeli military, and volunteer police officer, Mikito Shoshan**, threatening in Arabic: “To all the

⁵⁵ Maj. Asaf Fried, Facebook (6 January 2024), https://www.facebook.com/permalink.php?story_fbid=pfbid0b2okeSK3dLWLH4He7nHRCx7ohqzb3nTxPb2VJgMuQ8nDEBi8YQASSrTjzMcGgYayl&id=100000183658777, also available at Younis Tirawi, @ytirawi, Tweet (10:59 pm, 9 June 2024), <https://x.com/ytirawi/status/1799909080087105558>.

⁵⁶ “State prosecutor seeking to probe Ben Gvir for anti-Gazan incitement, in bid to pacify Hague — report”, *The Times of Israel* (2 July 2024), https://www.timesofisrael.com/liveblog_entry/state-prosecutor-seeking-to-probe-ben-gvir-for-anti-gazan-incitement-in-bid-to-pacify-hague-report/.

⁵⁷ Chen Maanit, “State Prosecutor Advises Against Probing Israeli Ministers, MKs Who Called to Harm Gazans”, *Haaretz* (19 August 2024), <https://www.haaretz.com/israel-news/2024-08-19/ty-article/.premium/state-prosecutor-advises-against-probing-israeli-ministers-mks-who-called-to-harm-gazans/00000191-6c00-d1ee-afb5-6e39b4a30000>: “State Prosecutor Amit Aisman has recommended to Attorney General Gali Baharav-Miara that no criminal investigations be opened against senior public figures, including ministers and members of Knesset, who have called to harm civilians in the Gaza Strip, the State Prosecutor’s Office said on Monday.”

⁵⁸ Maj. Asaf Fried, Facebook (3 July 2024), <https://www.facebook.com/share/p/moJtYxJU1MSDYfj3/>, also available at Younis Tirawi, @ytirawi, Tweet (12:43 am, 4 July 2024), <https://x.com/ytirawi/status/1808632790428074146>.

⁵⁹ Maj. Ilan Arad, Facebook (25 March 2024), <https://www.facebook.com/avadaviation/posts/pfbid07vd8StTjpP64gof5Fr39RzqltPuFZpNsmV6LP6mDnQndovdpLL8769JfZW34xPFCI>, also available at Younis Tirawi, @ytirawi, Tweet (12:33 pm, 4 July 2024), <https://x.com/ytirawi/status/1808811417748804055>.

⁶⁰ Maj. Yaniv Benami, Facebook (17 April 2024), <https://www.facebook.com/benamiy/posts/pfbid02sWtkLnyL5mJ8djtcwAQ4b613i8G8qaV2GZVSNjKn5qk46xupNpMSM4c5erW7mwgcl>, also available at Younis Tirawi, @ytirawi, Tweet (1:01 am, 7 October 2024), <https://x.com/ytirawi/status/1843064037321347139/photo/1>.

⁶¹ Maj. Yaniv Benami, Facebook (6 October 2024), <https://www.facebook.com/benamiy/posts/pfbid0kAs84B1a73St9UqXpEDvYt9cENxziHkA3A3tbDNveky3KFb1zKje7WFyzk44P74gl>, also available at Younis Tirawi, @ytirawi, Tweet (1:01 am, 7 October 2024), <https://x.com/ytirawi/status/1843064037321347139/photo/1>.

infidel Gazan dogs. Sons of Dogs and Pigs. Flee now or die. Because the divine Jewish army is coming to clean the land from your filthy blood”.⁶²

- On 3 December 2023, **Israeli Captain Avshalom Slock** posted on Facebook: “Where do we draw the line regarding who is uninvolved? [Regarding] who is considered an innocent civilian? What about the simple understanding that Hamas is the people in Gaza — [i]t was elected by them — these are their sons, their brothers, their children. This is essentially the public itself. . . They didn’t come from somewhere else; they didn’t seize control of the people there. They were born there, grew up there, were educated there, and they work in all Hamas frameworks (governmental, civilian, military, etc.). They are Hamas. This is simply the age group that can use weapons — the rest would give anything to join in the massacre and, indeed, participated in various ways . . . Everyone, everyone was part of the murder industry and the desire to destroy Israel. And even if there are a few who regret it, our battle is not against individuals; our battle is against a nation — and until we internalize that, we are doomed to fail. . . The only way we can achieve victory is if there is a complete cutoff of water and electricity, bringing hunger and deprivation to the point where the leadership sees their entire people collapsing, even to the extent that their fighters themselves will see their parents, wives, and children collapsing — their entire people collapsing”.⁶³
- On 21 March 2024, **Warrant Officer Ronen Bernshtein** posted on Facebook: “There are no innocent people in Gaza. And there’s no one in Judea and Samaria who wants to negotiate. The absolute majority of them are Nazis . . . It’s time to transfer them [forcibly] back to their countries of origin, or wait patiently for the next massacre. There is no middle ground”.⁶⁴
- On 24 March 2024, **Israeli army Sergeant Major and paratrooper, Doron Keidar**, who served in Gaza stated in a podcast interview, “what I’ve learned is that there are no civilians in this war . . . I was last in Gaza in 2004 . . . we knew what families, which groups were not pro-terrorist . . . now I don’t know who’s innocent here. What the terrorists have managed to do since 2005 is to brainwash a whole generation of young kids into hating Israel, into embracing terrorism as a means of life, and that that’s the only future and hope for them.”⁶⁵
- On 5 February 2024, **Israeli soldier Elad Huminer** reposted footage of Palestinians rebuilding homes in the wreckage and added the caption: “Beit Lahya, Northern Gaza Strip: Nazis return to what was once their house and build tin shacks on the rubble. Beyond Nakba, why let them come back there?”.⁶⁶
- On 5 February 2024, a video on Facebook recorded an **Israeli soldier stationed in Gaza** stating: “We are the sons of Abraham . . . We are the sons of Joshua who conquered this land from seven different peoples. Remember the Canaanites? The Hittites? The Jebusites? They all vanished from the world and the people of Israel are here to stay . . . And they tried to fight us . . . and every time they lost again. Every time we won again . . . thanks to the heroism of the

⁶² Younis Tirawi, @ytirawi, Tweet (9:31 am, 16 July 2024), <https://x.com/ytirawi/status/1813114239885652399>.

⁶³ Avshalom Slock, Facebook (3 December 2023), <https://www.facebook.com/avshalom.sluk/posts/pfbid02v8hHsjhAMV3Vrhb6Gdfj5k8TRxhTVtoAjZcV2Lvx3QvciUMykbRWx68QsWkfojKtI>, also available at Younis Tirawi, @ytirawi, Tweet (1:49 am, 11 September 2024), <https://x.com/ytirawi/status/1833654157795901759>.

⁶⁴ Ronen Tali Bernshtein, Facebook (21 March 2024), <https://www.facebook.com/ronen.bernshtein/posts/pfbid034oPXVP6foNwdunhL3knkvPoYY6C3soewDV5eReutRYbztTkQf8fjFmC9KMSgPv4I>, also available at Younis Tirawi, @ytirawi, Tweet (12:06 pm, 16 September 2024), <https://x.com/ytirawi/status/1835621234995818820>.

⁶⁵ “My Experience Fighting Inside Gaza - Israeli Paratrooper Master Sergeant Interview”, *Willy OAM* (24 March 2024), <https://www.youtube.com/watch?v=usf6apnBMek> [11:45].

⁶⁶ Elad Huminer, @EladHumi, Tweet (8:00 am, 5 February 2024), <https://x.com/eladhumi/status/1754399621277745570?s=46>, screenshot of tweet also available at Younis Tirawi, @ytirawi, Tweet (11:58 pm, 9 August 2024), <https://x.com/ytirawi/status/1822029662802837944?s=12>.

soldiers and citizens of Israel . . . They are not only human animals, they are also idiots. They give zero hope to their people, only hate and blood and hell.”⁶⁷

- On 11 February 2024, in an interview on Spanish television as he prepared to return to Gaza following leave, **Israeli soldier Yehuda López**, stated in relation to Gaza, “[t]here are no innocents there. We have to get that into our heads. There are no innocents there”. Asked how the Israeli military operations in Gaza would end, he stated: “Hopefully with a crushing defeat. That no one is left there. That there is no one left”.⁶⁸
 - On 13 February 2024, **Israeli soldiers besieging the Nasser Medical Complex in Khan Younis** ordered thousands of displaced and wounded Palestinian men, women and children to evacuate the hospital by shouting “get out, you animals” through an armoured tank loudhailer.⁶⁹
 - On 17 February 2024, a video of the **Israeli military’s Givati Brigade** filmed in the South of Gaza and broadcast on Israeli television Channel 14, showed Israeli soldiers asserting that “[t]here are no innocent people here”.⁷⁰
 - On 6 June 2024, **Israeli private Avishalom Weinberg, 55th Paratroopers Brigade** posted on Facebook: “. . . Just a reminder that there are no innocents in Gaza. Death to the enemy!”.⁷¹
 - On 7 June 2024, **Israeli soldier Itay Matok from the 401st brigade** who served in Gaza posted on Instagram: “It’s the beginning of the month, and just before Shabbat I want to say a few words to all [my] friends. ‘In a place where there is no human being, be a human being.’ How much meaning does this sentence gain when you’re in Gaza, a place with no man and no woman, no human being, but animals. For whoever slaughtered [others] so cruelly does not deserve to be a person, certainly not a human being. I am speaking from here to all [my] friends who were with me every day. You have managed to bring the purity of the people of Israel to such a bad place, and we got to step foot in the [same] location from which beasts came to exterminate us, the people of Israel. Every single person left their opinion at home and came to fight . . . for our home. I will finish by saying that I am lucky to have gotten to know you and lucky to serve with you. Gaza, Gaza over.”⁷²
7. Directly echoing the statements of senior governmental officials that there are no “uninvolved civilians” in Gaza, Israeli combat soldiers repeatedly photograph and film themselves with various animals — including dogs, goats and horses — asserting that the animals are the “only uninvolved civilians” in Gaza.⁷³

⁶⁷ Younis Tirawi, @ytirawi, Tweet (12:58 pm, 6 February 2024), <https://twitter.com/ytirawi/status/1754640691425124386>.

⁶⁸ Interview with Yehuda López on TVE channel, 11 February 2024; Almudena Ariza, @almariza, Tweet (9:39 pm, 11 February 2024), <https://twitter.com/almariza/status/1756764797717148078>.

⁶⁹ Mohammed Alhalou, @mo_elhelo21, Instagram Post (13 February 2024), <https://www.instagram.com/p/C3SJX11trhs/>.

⁷⁰ “Individuals of virtue: dramatic documentation of the Givati Brigade in the south of the Gaza Strip, Hallel Biton Rosen’s film”, Channel 14 (17 February 2024), <https://www.youtube.com/watch?v=Ij-ZbxNvEtQ&t=921s>, [24:40], translation at B.M., @ireallyhateyou, Tweet (7:04 am, 18 February 2024), <https://x.com/ireallyhateyou/status/1759081361539813847>.

⁷¹ Avishalom Weinberg, Facebook (6 June 2024), https://www.facebook.com/permalink.php?story_fbid=pfbid02ZHgBq5FNr5vBhnXymBS3dsLsQAcvUBrUKGCi6RQghwLBlfJgCFoyjiEcTEBsdAuSl&id=100000210994921, also available at Younis Tirawi, @ytirawi, Tweet (12:03 pm, 9 June 2024), <https://x.com/ytirawi/status/1799744145361395776>.

⁷² Itay Matok, @itay_matok, Instagram Post (7 June 2024), https://www.instagram.com/p/C766BENsT9U/?img_index=1, also available at Younis Tirawi, @ytirawi, Tweet (12:25 am, 1 July 2024), <https://x.com/ytirawi/status/1807540975902102009>.

⁷³ “Israeli soldier says stray dogs are the ‘only uninvolved civilians’ in Gaza”, *Middle East Eye* (5 February 2024), <https://www.youtube.com/watch?v=7pc2bL8tTC0>; Younis Tirawi, @ytirawi, Tweet (2:06 am, 14 January 2024), <https://twitter.com/ytirawi/status/1746322932643610798>. See further B.M., @ireallyhateyou, Tweet (2:34 am, 16 January 2024), <https://twitter.com/ireallyhateyou/status/1747054796752699837>: “poor ones, they were thirsty so we took care of them. These are the only uninvolved we care for.”

Israeli Soldiers Mocking Palestinian Deaths and Desecrating Palestinian bodies

8. Israeli soldiers' rampant dehumanisation of Palestinians is also evident from their conduct. Israeli soldiers in Gaza routinely joke about their massacres of Palestinians.⁷⁴ On one occasion, following the deliberate targeting and killing by Israeli soldiers of a group of seemingly displaced Palestinian men and women on a horse-drawn cart in March 2024, they joked "too bad for the horse".⁷⁵ As Palestinian children literally starved to death,⁷⁶ Israeli soldiers in Gaza mockingly filmed themselves intentionally demolishing and burning food supplies,⁷⁷ and driving over food supplies with their tanks.⁷⁸ They also admit and brag with impunity⁷⁹ about running over "dead or alive"⁸⁰ Palestinians themselves with bulldozers and tanks — which explains the horrific scenes of crushed bodies which survivors in Gaza have documented,⁸¹ including of a wounded Palestinian patient with a full leg cast whose body was otherwise completely crushed, in the vicinity of Al Shifa hospital.⁸² Israeli soldiers are also filmed, digging up and demolishing Palestinian graves,⁸³ and using loaders to dispose of Palestinian bodies,⁸⁴ as remains of whole families are bulldozed into piles of garbage.⁸⁵ In sieges

⁷⁴ See Younis Tirawi, @ytirawi, Tweet (11:20 pm, 19 January 2024), <https://x.com/ytirawi/status/1748455365480415353>; "Captain Loupy" was Awarded with an honour certificate: Younis Tirawi, @ytirawi, Tweet (5:02 pm, 30 January 2024), <https://x.com/ytirawi/status/1752346657625104791>.

⁷⁵ Younis Tirawi, @ytirawi, Tweet (10:30 pm, 21 March 2024), <https://twitter.com/ytirawi/status/1770910935714033927>. See also Forensic Architecture, *A Spatial Analysis of the Israeli Military's Conduct in Gaza since October 2023* (15 October 2024), https://content.forensic-architecture.org/wp-content/uploads/2024/10/FA_A-Spatial-Analysis-of-the-Israeli-militarys-conduct-in-Gaza-since-October-2023.pdf, pp. 64-65.

⁷⁶ UN News, *Gaza: Worst famine fears realised as 10th child reportedly 'starves to death'* (1 March 2024), <https://news.un.org/en/story/2024/03/1147112>.

⁷⁷ Younis Tirawi, @ytirawi, Tweet (4:07 pm, 13 February 2024), <https://x.com/ytirawi/status/1757406177883750809>; Muhammad Shehadeh, @muhammadshehad2, Tweet (1:20 am, 10 December 2023), <https://x.com/muhammadshehad2/status/1733627762085183877>.

⁷⁸ Quds News Network, @QudsNen, Tweet (8:43 pm, 24 February 2024), <https://twitter.com/QudsNen/status/1761461886690718101>.

⁷⁹ Middle East Eye, @middleeasteye (4:45 am, 6 March 2024), <https://twitter.com/middleeasteye/status/1765237302794842195>; Daniel Luroeu, @danilurietw, Tweet (10:04 am, 4 March 2024), <https://archive.fo/YhhMo>. See also Middle East Eye, @MiddleEastEye, Tweet (3:06 pm, 22 February 2024), <https://twitter.com/MiddleEastEye/status/1760667469839216980>.

⁸⁰ Knesset, @theknesset, Instagram post (17 June 2024), <https://www.instagram.com/theknesset/reel/C8UcGxKNuD9>; The Knesset TV, <https://www.knesset.tv/committees/the-state-control-committee/video/68969/> [1:23:39], also available at B.M., @ireallyhateyou, Tweet (10:26 pm, 18 June 2024), <https://x.com/ireallyhateyou/status/1803162332648165507>: "We went through four months that I cannot even describe to you. We ran over hundreds of terrorists, dead or alive . . .".

⁸¹ Euro-Med Human Rights Monitor, *Israeli tanks have deliberately run over dozens of Palestinian civilians alive* (4 March 2024), <https://euromedmonitor.org/en/article/6202/Israeli-tanks-have-deliberately-run-over-dozens-of-Palestinian-civilians-alive>; Eye On Palestine, @EyeOnPalestine, Tweet (7:54 pm, 22 March 2024), <https://twitter.com/EyeonPalestine/status/1771234085320503605>; Ramy Abdu, @RamAbdu, Tweet (10:15 pm, 1 March 2024), <https://x.com/RamAbdu/status/1763674532680737091>; Mint Press News, @mintpress, Instagram post (25 April 2024), https://www.instagram.com/mintpress/p/C6L_rEUiZvI/.

⁸² *Ibid.*

⁸³ Middle East Monitor, @middleeastmonitor, Instagram post (23 March 2024), <https://www.instagram.com/reel/C42y55dro80/>. See also Jeremy Diamond *et al.*, "At least 16 cemeteries in Gaza have been desecrated by Israeli forces, satellite imagery and videos reveal", *CNN* (20 January 2024), <https://edition.cnn.com/2024/01/20/middleeast/israel-gaza-cemeteries-desecrated-investigation-intl-cmd/index.html>.

⁸⁴ "Palestinians killed waving white fabric: Israeli army shoots two unarmed men dead", *Al Jazeera English* (28 March 2024), <https://www.youtube.com/watch?v=rjYudMS3qls>; "Exclusive video shows Israel soldiers killing Palestinians | Al Jazeera Newsfeed", *Al Jazeera English* (12 June 2024), <https://www.youtube.com/watch?v=MfVFKfNeiPE&rc=1>. See also Oren Ziv, "I'm bored, so I shoot": The Israeli army's approval of free-for-all violence in Gaza", *+972 Magazine* (8 July 2024), <https://www.972mag.com/israeli-soldiers-gaza-firing-regulations/>: "But before the humanitarian convoys arrive, S. noted, the bodies are removed. 'A D-9 [Caterpillar bulldozer] goes down, with a tank, and clears the area of corpses, buries them under the rubble, and flips [them] aside so that the convoys don't see it — [so that] images of people in advanced stages of decay don't come out,' he described."; This practice by the Israeli military has also been recorded in years prior, see *e.g.*, *Al Jazeera English*, @AJEnglish, Tweet (9:09 pm, 23 February 2020), <https://twitter.com/AJEnglish/status/1231657316820357123>.

⁸⁵ Riley Mellen *et al.*, "How a Single Family Was Shot Dead on a Street in Gaza", *The New York Times* (6 September 2024), <https://www.nytimes.com/video/world/middleeast/100000009614868/israel-gaza-war-family-killed.html?smid=pl-share>, [13:00-13:50]: "these were the family's remains, bulldozed into a pile of garbage, not far from where they were shot."

of hospitals⁸⁶ — Israeli soldiers order Palestinians to bury the dead, only to return with bulldozers to pull out the corpses and crush them further.⁸⁷ Israeli forces also take bodies to Israel, sometimes returning these — full bodies, half bodies and body parts — in bags,⁸⁸ no longer identifiable due to decomposition.⁸⁹ Meanwhile, soldiers have taken photos of mutilated and burned corpses, and distributed this “exclusive content from the Gaza Strip” through the now-defunct, but previously *Israeli military-run* Telegram channel ‘72 Virgins — Uncensored’.⁹⁰

Treatment of Palestinian captives

9. Israeli soldiers deployed in Gaza have been reported to have forced Palestinians — including doctors, medics, journalists, aid workers, and children⁹¹ — to strip to their underwear, mocking and humiliating them, including beating them, draping them in the Israeli flag, and forcing them to sing Israeli songs or chant Israeli slogans, and posting on social media photographs and films of them stripped, bound blindfolded, and often paraded for public⁹² — which are also broadcast on Israeli

⁸⁶ World Health Organization, *Six months of war leave Al-Shifa hospital in ruins, WHO mission reports* (6 April 2024), <https://www.who.int/news/item/06-04-2024-six-months-of-war-leave-al-shifa-hospital-in-ruins--who-mission-reports#>; UN OCHA, *Hostilities in the Gaza Strip and Israel | Flash Update #149* (3 April 2024), <https://www.ochaopt.org/content/hostilities-gaza-strip-and-israel-flash-update-149>.

⁸⁷ “Al Shifa Hospital: The Crimes They Tried To Bury”, *Al Jazeera* 360 (12 June 2024), <https://www.youtube.com/watch?v=IlerY4M9kQc> [21:10]. See also Abeer Salman and Kareem Khadder, “Doctors accuse Israeli troops of desecrating bodies and shooting civilians at hospital Israel says was Hamas ‘command center’”, *CNN* (23 December 2023), <https://edition.cnn.com/2023/12/23/middleeast/kamal-adwan-hospital-gaza-israel-abuse-allegations-intl-cmd/index.html>.

⁸⁸ Nidal Al-Mughrabi and Mohammed Salem, “Palestinians bury dozens in Gaza after Israel hands over bodies”, *Reuters* (30 January 2024), <https://www.reuters.com/world/middle-east/israel-hands-over-bodies-palestinians-killed-gaza-palestinian-health-officials-2024-01-30/>; “Israel returns ‘decomposed’ bodies of 89 Palestinians to Gaza”, *Al Jazeera* (5 August 2024), <https://www.aljazeera.com/news/2024/8/5/israel-returns-decomposed-bodies-of-89-palestinians-to-gaza#>; “Bodies of 84 Palestinians handed over by Israeli army”, *Al Jazeera* (5 August 2024), <https://www.aljazeera.com/news/liveblog/2024/8/5/israels-war-on-gaza-live-80-of-victims-of-school-bombings-are-children?update=3096524>; Nidal Al-Mughrabi, “Israel sends scores of bodies to Gaza; Palestinians demand details before burying them”, *Reuters* (26 September 2024), <https://www.reuters.com/world/middle-east/israel-sends-scores-bodies-gaza-palestinians-demand-details-before-burying-them-2024-09-25/>.

⁸⁹ UN OCHA, *Hostilities in the Gaza Strip and Israel | Flash Update #108* (1 February 2024), <https://www.ochaopt.org/content/hostilities-gaza-strip-and-israel-flash-update-108>: “According to the MoH in Gaza, between 80 to 100 bodies were received and most were unidentifiable due to decomposition and were consequently buried in a mass grave in Rafah.”

⁹⁰ The military closed its channel following public outrage. See e.g., Yaniv Kubovich, “Graphic Videos and Incitement: How the IDF Is Misleading Israelis on Telegram”, *Haaretz* (12 December 2023), <https://www.haaretz.com/israel-news/security-aviation/2023-12-12/ty-article/.premium/graphic-videos-and-incitement-how-the-idf-is-misleading-israelis-on-telegram/0000018c-5ab5-df2f-adac-febd01c30000>; “IDF says it ran unauthorized ‘72 Virgins - Uncensored’ Telegram channel”, *Jerusalem Post* (6 February 2024), <https://www.jpost.com/israel-hamas-war/article-785378>.

⁹¹ “Gaza medics tell BBC that Israeli troops beat and humiliated them after hospital raid”, *BBC* (12 March 2024), <https://www.bbc.co.uk/news/world-middle-east-68513408>; UNRWA, *Detention and Alleged Ill-Treatment of Detainees from Gaza during Israel-Hamas War* (16 April 2024), <https://www.unrwa.org/resources/reports/detention-and-alleged-ill-treatment-detainees-gaza-during-israel-hamas-war>; UN OHCHR, *Thematic Report Detention in the context of the escalation of hostilities in Gaza (October 2023-June 2024)* (31 July 2024), <https://www.ohchr.org/sites/default/files/documents/countries/opt/20240731-Thematic-report-Detention-context-Gaza-hostilities.pdf>, p. 12; UNGA, *Report of the Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel*, A/79/232 (11 September 2024), <https://undocs.org/A/79/232>, p. 22, paras. 101 - 110; Rob Schmitz and Anas Baba, “Shot by Israeli troops while getting aid, a boy in Gaza fights for his life”, *NPR* (24 April 2024), <https://www.npr.org/2024/04/24/1246593844/israel-gaza-palestinian-boy-shot-food-aid>.

⁹² Younis Tirawi, @ytirawi, Tweet (1:26 pm, 8 November 2024), <https://x.com/ytirawi/status/1854847909667225765>; Genocide in Gaza through the eyes of Israeli soldiers | The Listening Post”, *Al Jazeera English* (3 March 2024), <https://www.youtube.com/watch?v=JAT9NQ4WkE0> [1:15]-[1:26]; “Social Media Posts Show Off Blindfolded and Bound Palestinian Detainees”, *Bellingcat* (5 March 2024), <https://www.bellingcat.com/news/2024/03/05/social-media-posts-show-off-blindfolded-and-bound-palestinian-detainees/>; Younis Tirawi, @ytirawi, Tweet (11:51 pm, 25 March 2024), <https://twitter.com/ytirawi/status/1772380808327618560>; Younis Tirawi, @ytirawi, Tweet (12:20 pm, 5 March 2024), <https://twitter.com/ytirawi/status/1764778057364042167>; Times of Gaza, @Timesofgaza (5:36 am, 7 March 2024), <https://twitter.com/Timesofgaza/status/1765582266808283381>; Quds News Network, @QudsNen, Tweet (11:31 am, 4 March 2024), <https://twitter.com/QudsNen/status/1764584439961550849>; Younis Tirawi, @ytirawi, Tweet (6:01 pm, 12 February 2024), <https://twitter.com/ytirawi/status/1757072533197656551>; Younis Tirawi, @ytirawi, Tweet (1:52 am, 5 February 2024), <https://twitter.com/ytirawi/status/1754291866588090601>; Younis Tirawi, @ytirawi, Tweet (6:54 pm, 26 October 2024), <https://x.com/ytirawi/status/1850219522034143276>.

television.⁹³ There are multiple testimonies as well as footage of Israel forcing Palestinians to be their human shields, translators or messengers, and subsequently killing them.⁹⁴ The Commission of Inquiry found that Israeli forces “used detainees as human shields in several instances in the West Bank and Gaza, which constitutes a war crime”, including “forc[ing] detainees into tunnels and buildings ahead of military personnel in the Gaza Strip”.⁹⁵

10. One video shows an Israeli soldier bragging about having tortured a Palestinian man being taken from an Israeli army vehicle, stating: “These sons of whores. . . I will show you his back . . . we tortured him”.⁹⁶ In another video uploaded to the internet, an Israeli soldier forced a group of detained, bound and blindfolded Palestinians to chant: “[w]e want to be slaves of the Azolai family [one of the soldier’s family] forever and ever”.⁹⁷ The language of slavery is reflective of teachings by some Israeli rabbis, including Rabbi Eliezer Kashtiel — a senior instructor at the Bnei David pre-military religious academy in the illegal Israeli West Bank settlement of Eli — at which the Israeli Prime Minister gave his ‘total victory’ speech on 30 January 2024 (above), calling the institution “an exemplary yeshiva . . . to the glory of the people, heritage and fighters of Israel”.⁹⁸ In 2019, Israeli Channel 13 broadcast leaked comments made by the Rabbi asserting that: “It’s best to be a slave of a Jew. They are happy to be slaves . . . We have nations around us with genetic problems. The Arab wants to be under occupation because they have a genetic issue, they don’t know how to manage a country, they don’t know how to do anything. Look at how they look”.⁹⁹

⁹³ See, e.g., “Individuals of virtue: dramatic documentation of the Givati Brigade in the south of the Gaza Strip”, *Channel 14* (17 February 2024), <https://www.youtube.com/watch?v=Ij-ZbxNvEtQ&t=921s> [at 24:07].

⁹⁴ Palestinian Centre for Human Rights (‘PCHR’), *They forced me to wear the Israeli military uniform and search houses* (15 September 2024), <https://pchrgaza.org/they-forced-me-to-wear-the-israeli-military-uniform-and-search-houses/>; PCHR, *How the Israeli Occupying Forces executed Ahmed Abu Helal in cold blood...* (19 August 2024), <https://pchrgaza.org/details-of-the-execution-of-ahmed-abu-hilal-in-the-hands-of-the-israeli-forces/>; Al Mezan Center for Human Rights (‘Al Mezan’), *Gaza: Israeli Military Uses Abducted Palestinians as Human Shields* (3 September 2024), <https://mezan.org/en/post/46516/Gaza:-Israeli-Military-Uses-Abducted-Palestinians-as-Human-Shields>; PCHR, *A heartbreaking testimony of a displaced Palestinian mother* (22 June 2024), <https://pchrgaza.org/en/a-heartbreaking-testimony-of-a-displaced-palestinian-mother/>; Louisa Loveluck *et al.*, “Israeli forces used civilians as human shields in Gaza, Palestinians and soldiers say”, *The Washington Post* (3 November 2024), <https://www.washingtonpost.com/world/2024/11/03/israel-gaza-human-shields-palestinians-idf/>. See also Kavitha Chekuru, “IDF sent in handcuffed prisoner to evacuate hospital, then killed him when he left”, *The Intercept* (14 February 2024), <https://theintercept.com/2024/02/14/gaza-nasser-hospital-evacuation-israel-prisoner/>. See also Younis Tirawi, @ytirawi, Tweet (8:59 pm, 30 June 2024), <https://x.com/ytirawi/status/1807489075340816530>; Yaniv Kubovich and Michael Hauser Tov, “Haaretz Investigation: Israeli Army Uses Palestinian Civilians to Inspect Potentially Booby-trapped Tunnels in Gaza”, *Haaretz* (13 August 2024), <https://www.haaretz.com/israel-news/2024-08-13/ty-article-magazine/-premium/idf-uses-gazan-civilians-as-human-shields-to-inspect-potentially-booby-trapped-tunnels/00000191-4c84-d7fd-a7f5-7db6b99e0000>; Natan Odenheimer *et al.*, “How Israel’s Army Uses Palestinians as Human Shields in Gaza”, *New York Times* (14 October 2024), <https://www.nytimes.com/2024/10/14/world/middleeast/israel-gaza-military-human-shields.html>; The Grayzone, @TheGrayZoneNews, Tweet (6:02 am, 16 September 2024), <https://x.com/TheGrayZoneNews/status/1835529671129067730>; “Investigating war crimes in Gaza I Al Jazeera Investigations”, *Al Jazeera English* (3 October 2024), <https://www.youtube.com/watch?v=kPE6vbKix6A>, [59:14-01:01:02, 01:01:49-01:02:05]; “Palestinian in Gaza Shot to Death by Israeli Commander While Assisting IDF Forces, Report Says”, *Haaretz* (7 January 2024), <https://www.haaretz.com/israel-news/2025-01-07/ty-article/palestinian-in-gaza-shot-to-death-by-israeli-commander-while-assisting-idf-report-says/00000194-41c0-dfbb-a7bc-6ff647500000>.

⁹⁵ UNGA, *Report of the Independent International Commission of Inquiry on the Occupied Palestinians Territory, including East Jerusalem, and Israel*, A/79/232 (11 September 2024), <https://undocs.org/A/79/232>, p. 21, para. 107.

⁹⁶ Younis Tirawi, @ytirawi, Tweet (2:57 am, 19 March 2024), <https://twitter.com/ytirawi/status/1769890847703568665>.

⁹⁷ “War on Gaza: Video shows Israeli soldier forcing detained Palestinians to say ‘we want to be slaves’”, *Middle East Eye* (31 January 2024), <https://www.middleeasteye.net/news/israel-soldier-coerces-detained-palestine-we-want-be-slaves>; Middle East Eye, @MiddleEastEye, Tweet (8:21 am, 31 January 2024), <https://twitter.com/MiddleEastEye/status/1752577833577460167>.

⁹⁸ Israel Prime Minister’s Office, *PM Netanyahu to the Students of the Bnei David Institutions in Eli: “The testament of the fallen is our mission – total victory”* (30 January 2024), <https://www.gov.il/en/departments/news/event-visit300124>.

⁹⁹ Tamar Pileggi, “Embracing racism, rabbis at pre-army yeshiva laud Hitler, urge enslaving Arabs”, *The Times of Israel* (30 April 2019), <https://www.timesofisrael.com/embracing-racism-rabbis-at-pre-army-yeshiva-laud-hitler-urge-enslaving-arabs/>.

11. Soldiers who served in Sde Teiman, one of the military detention centers in which Israel systematically subjected Palestinians from Gaza to torture and cruel, inhuman and degrading treatment,¹⁰⁰ attested to the mindset of their peers, stating:

“I sat on my bed and for hours I googled laws related to the incarceration of unlawful combatants. I did a session on ChatGPT and asked about crimes and rules of war. The next day I realized that I couldn’t continue there any longer . . . after all the preparation and the things they tell you there. They keep pumping it into your brain that you have to disconnect. That they’re not people. That they’re not human beings. . . The guys, the company commander, the officers, everyone. You know, there was a female officer who gave us a briefing on the day we arrived. She said, ‘It will be hard for you. You’ll want to pity them, but it’s forbidden. Remember that they aren’t people. From your point of view, they are not human beings. The best thing is to remember who they are and what they did in October.’”¹⁰¹

Another soldier attested that:

“[T]he dehumanization frightened me. I couldn’t understand how a group of young people who were around me every day underwent such a dangerous process in such a short time . . . I felt an obligation to document what I heard. I took out my phone and began transcribing everything I heard [following is an excerpt from her transcript, which she titled]: ‘2 June 2024 testimony: reserve call-up of female squad commanders to military police. Conversations around: ‘We’ll beat them with clubs.’ ‘I will just spit on them.’ ‘How do you plan to beat terrorists?’ . . .”¹⁰²

12. This occurs against the backdrop of testimony collected by the United Nations Relief and Works Agency for Palestine Refugees in the Near East (‘UNRWA’) of the Israeli army having used nail guns on prisoners’ knees, sexual abuse against men and women under their detention, and in some cases, insertion of electrified metal sticks into prisoners’ rectums,¹⁰³ and of reports by the United Nations Commission of Inquiry of systematic abuse — committed with the intent to inflict pain and suffering — amounting to Israeli forces’ infliction of torture and cruel, inhumane and

¹⁰⁰ See e.g., *Thematic Report: UN OHCHR, Detention in the context of the escalation of hostilities in Gaza (October 2023 – June 2024)* (31 July 2024), <https://www.ohchr.org/sites/default/files/documents/countries/opt/20240731-Thematic-report-Detention-context-Gaza-hostilities.pdf>; “Strapped down, blindfolded, held in diapers: Israeli whistleblowers detail abuse of Palestinians in shadowy detention center”, *CNN* (11 May 2024), <https://edition.cnn.com/2024/05/10/middleeast/israel-sde-teiman-detention-whistleblowers-intl-cmd/index.html>; B’Tselem, *Welcome to Hell* (August 2024), <https://www.btselem.org/sites/default/files/publications/202408welcometohelleng.pdf>; UNRWA, *Detention and alleged ill-treatment of detainees from Gaza during Israel-Hamas War* (16 April 2024), <https://www.un.org/unispal/document/detention-and-ill-treatment-unrwa-report-16apr24/>, pp. 1-3; Addameer, *Enforced Disappearance* (undated), <https://www.addameer.org/sites/default/files/publications/Enforced%20%281%29.pdf>; Tareq Hilou *et al.*, “‘They told me to strip.’ Former Palestinian detainee says he was sexually abused in an Israeli prison”, *CNN* (25 August 2024), <https://edition.cnn.com/2024/08/25/middleeast/former-palestinian-detainee-sexually-abused-in-israeli-prison-mime-intl/index.html>.

¹⁰¹ Shay Fogelman, “We Served on Israel’s Sde Teiman Base. Here’s What We Did to Gazans Detained There”, *Haaretz* (16 August 2024), <https://www.haaretz.com/israel-news/2024-08-16/ty-article-magazine/.highlight/we-served-on-israels-sde-teiman-base-heres-what-we-did-to-gazans-detainees/00000191-5591-d60d-a59b-ff994cb40000>.

¹⁰² *Ibid.*

¹⁰³ UN OHCHR, *UN experts appalled by reported human rights violations against Palestinian women and girls* (19 February 2024), <https://www.ohchr.org/en/press-releases/2024/02/israelopt-un-experts-appalled-reported-human-rights-violations-against>; UNRWA, *Detention and alleged ill-treatment of detainees from Gaza during Israel-Hamas War* (Undated), https://www.unrwa.org/sites/default/files/content/resources/summary_on_detention_and_alleged_ill-treatmentupdated.pdf. See also Healthcare Workers Watch, *The Killing, Detention and Torture of Healthcare Workers in Gaza* (7 October 2024), https://healthcareworkerswatch.org/wp-content/uploads/2024/10/HWW-report_The-killing-detention-and-torture-of-HCWs-in-Gaza_October-7-2024_Final.pdf.

degrading treatment as a war crime and crime against humanity of Palestinians¹⁰⁴ and of sexualized torture against Palestinian men and boys:

“Male detainees were subjected to attacks on their sexuality and reproductive organs, including violence to their genitals and anus, and were forced to perform humiliating and strenuous acts naked or stripped as a form of punishment or intimidation, with a view to extract information from them. Male detainees were subjected to rape, which is a war crime and a crime against humanity. Such acts of sexual violence, causing severe physical and mental suffering, also amount to torture.”¹⁰⁵

As of December 2024, there are an estimated 10,154 Palestinians recorded in Israeli custody,¹⁰⁶ and many more whose whereabouts are unknown.¹⁰⁷

13. The overt dehumanising public statements, acts and footage by Israeli soldiers listed above are made in the broader context of the total dehumanisation of Palestinians by Israeli State officials,¹⁰⁸ and their encouragement of dehumanising conduct towards Palestinians.¹⁰⁹

Promoting Violations of the Law of Armed Conflict

14. Numerous Israeli officers also promoted the violation of international humanitarian law in other ways, advocating and inciting dehumanising conduct, war crimes, and atrocity crimes. They called for the use of Palestinians as human shields, the killing of Palestinians in detention or *hors de combat*, disproportionate firepower, and repeatedly stressed the general need to exact revenge:

- On 7 October 2023, **Colonel Daniel Rod** posted on Facebook: “. . . I expect and hope that a disproportionate response in the strip... [sic] Not gradual and not in stages, but immediately and disproportionately!!!! . . .”¹¹⁰

¹⁰⁴ UNGA, *Report of the Independent International Commission of Inquiry on the Occupied Palestinians Territory, including East Jerusalem, and Israel*, A/79/232 (11 September 2024), <https://undocs.org/A/79/232>, p. 20, paras. 102-103. See also UN OHCHR, *Thematic Report: UN OHCHR, Detention in the context of the escalation of hostilities in Gaza (October 2023 – June 2024)* (31 July 2024), <https://www.ohchr.org/sites/default/files/documents/countries/opt/20240731-Thematic-report-Detention-context-Gaza-hostilities.pdf>, pp. 9 – 13.

¹⁰⁵ UNGA, *Report of the Independent International Commission of Inquiry on the Occupied Palestinians Territory, including East Jerusalem, and Israel*, A/79/232 (11 September 2024), <https://undocs.org/A/79/232>, p. 21, para. 108.

¹⁰⁶ HaMoked Center for the Defence of the Individual, *10,154 “Security” Inmates Are Held In Prisons Inside Israel* (December 2024), <https://hamoked.org/prisoners-charts.php>. This includes both Palestinian detainees from the West Bank, including East Jerusalem (3,428 Palestinian are held as administrative detainees) and from Gaza (1,772 Palestinians are held as “unlawful combatants”). For the use of the status of “unlawful combatant” to detain and deport Palestinians from Gaza to Israel, and hold them without trial, see e.g. UN OHCHR, *Thematic Report: UN OHCHR, Detention in the context of the escalation of hostilities in Gaza (October 2023 – June 2024)* (31 July 2024), <https://www.ohchr.org/sites/default/files/documents/countries/opt/20240731-Thematic-report-Detention-context-Gaza-hostilities.pdf>, particularly pp. 18 - 20; B’tselem, *Welcome to Hell* (August 2024), https://www.btselem.org/sites/default/files/publications/202408_welcome_to_hell_eng.pdf.

¹⁰⁷ *Ibid.*. See also International Committee of the Red Cross (‘ICRC’), *Israel and the Occupied Territories: Key Facts and Figures* (7 October 2023 – 25 September 2024) (12 December 2024), <https://www.icrc.org/en/article/israel-and-occupied-territories-key-facts-and-figures-7-october-2023-25-september-2024>: “Engaged with the families of 13,358 Palestinians reported missing in Gaza and the West Bank to collect relevant information to help us clarify the fate and whereabouts of their loved ones.”

¹⁰⁸ See Annex I: STATEMENTS EVIDENCING GENOCIDAL INTENT AND INCITEMENT TO GENOCIDE BY SENIOR ISRAELI GOVERNMENTAL OFFICIALS.

¹⁰⁹ See e.g. Statements by Minister of National Security in Annex I, pp. 21-27; UNGA, *Report of the Independent International Commission of Inquiry on the Occupied Palestinians Territory, including East Jerusalem, and Israel*, A/79/232 (11 September 2024), <https://undocs.org/A/79/232>, p. 21, para. 103: “This systematic abuse is directly and causally linked to statements made by Israeli officials, including the Minister of National Security, who is responsible for the Israel Prison Service, and other members of the Israeli coalition Government legitimizing revenge and violence against Palestinians. The lack of accountability for actions of individual members of the Israeli security forces and the increasing acceptance of violence against Palestinians have allowed such conduct to continue uninterrupted and become systematic and institutionalized.”

¹¹⁰ Col. Daniel Rod, Facebook (7 October 2023), <https://www.facebook.com/daniel.rod.5/posts/pfbid0qTnubDKayHP3c3d8MCFaCbWJRrQN4RzXJZkCD5Tgbdobfa2owhrJxxmQ6DgMRDUj1>, also available at Younis Tirawi, @ytirawi, Tweet (11:54 am, 9 June 2024), <https://x.com/ytirawi/status/1799741771729289285>.

- On 8 October 2023, **Colonel Elad Schwartz from the 91st Division of the Israeli army** recorded himself delivering a personnel message to the Chief of the General Staff and the Prime Minister, advocating for “disproportionate” attacks on Gaza: “We can’t respond as we usually do to what happened yesterday. There needs to be something disproportionate. There needs to be something that will send a message . . . Let the Prime Minister come out, and stand on live television and say . . . That if in four hours, all the hostages aren’t freed, freed back [home], we start to burn Gaza. Neighbourhood after neighbourhood. Half an hour between one neighbourhood to another, the ultimatum will continue. From the air and from the ground. Neighbourhood after neighbourhood. Burn Gaza!”¹¹¹
- In a video from 4 November 2023 filmed in Beit Lahia — one of the first areas of Gaza to have been devastated by the Israeli military¹¹² — and broadcast on Israeli television, **Colonel Erez Eshel** commented on the concept of revenge, stating that it is “[a] great value. There’s the value of revenge for what was done to us. So that 100 years [from now] they will understand you don’t mess with the Jews. It will take so many years to recover from this blow, but we will recover after a victory like never seen before”. When asked what such victory is he said: “Even if it takes a year, two years, three, by the 80th anniversary to the State [of Israel] we will clean this [out]. This place [will be like] a plowed field, they won’t be able to live here. They won’t be able to live threatening us.”¹¹³
- On 13 May 2024, the day before Israel’s national day, **Lieutenant Colonel Eran Burg** stated: “I really hope that at 11 o’clock, when the siren rings, a rain of munitions will fall on the Gaza Strip, so that they too will remember and never forget.”¹¹⁴
- On 22 June 2024, **Major Asaf Fried** commented on a video showing the Israeli military using a Palestinian as a human shield in the West Bank, stating: “These soldiers should receive a commendation and the idea should be copied all across the IDF[.] Let’s see the dogs [try to] attack the force now.”¹¹⁵
- On 22 October 2023, **Major Meir Liosh, an infantry commander**, posted: “I only now understand what is this heavy feeling I’ve had these past two weeks. When there were terrorist attacks in Judea and Samaria [occupied West Bank] we told ourselves — we are from Petah Tikva/Tel Aviv/Netivot/Ofakim . . . And then came Simchat Torah [7.10.24], and the slaughter of the Gaza Envelope martyrs. . . There was nowhere left to run. Now we must take revenge in a way so strong, so cruel, so crazy, so disproportionate, that it will strike fear even at the end of the world. . . With blood and sweat / Shall arise a race / Proud and generous, And cruel. And cruel. [quoting the Betar song written by Zeev Jabotinsky].”¹¹⁶
- On 16 December 2023, **Major Amnon Bahat**, posted on Facebook: “. . . We should keep our western understandings regarding ‘the pointlessness of revenge’ for other instances against other peoples. Now it’s time to enact vengeance hard

¹¹¹ Younis Tirawi, @ytirawi, Tweet (8:49 pm, 21 April 2024), <https://x.com/ytirawi/status/1782119361639055517>.

¹¹² Dominic Bailey *et al*, “Nearly 100,000 Gaza buildings may be damaged, satellite images show”, *BBC* (1 December 2023), <https://www.bbc.com/news/world-middle-east-67565872>.

¹¹³ “Segment from ‘Special documentation from the heart of Gaza: this is how our forces fight deep in enemy territory’”, *Hallel Bitton Rosen* (4 November 2023), https://www.youtube.com/watch?v=fqEj3DzadiM_, [5:57-6:28]. See also Elhanan Mazuz, “Special documentation from the heart of Gaza: This is how our forces fight deep in enemy territory”, *Now 14* (5 November 2023), <https://www.now14.co.il/בליחמים-כוחותינו-כך-עזה-מלב-מיוחד-תיעוד/>.

¹¹⁴ Lt. Col. Eran Burg, Facebook (13 May 2024), <https://www.facebook.com/eran.burg/posts/pfbid02GJAWqSAF5SB2P3Rh6grR7PthBHdc6RmnBVVPkaBu1m4KBFFC8PbGhJCCJRobUGCNl>, also available at Younis Tirawi, @ytirawi, Tweet (7:33 pm, 4 June 2024), <https://x.com/ytirawi/status/1798045490413744162>.

¹¹⁵ Maj. Asaf Fried, Facebook (22 June 2024), https://www.facebook.com/permalink.php?story_fbid=pfbid02LowmvMkCmLbzVy3zotLak5b3g9zGEbyLjPBEWD9BECSb1J5ayarwoSzc55oCyxzl&id=100000183658777.

¹¹⁶ Maj. Ben Zion Meir Layosh, Facebook (22 October 2023), <https://www.facebook.com/meir.layosh/posts/pfbid0dDvo6p6uvktSdZmDdtMa19Ytm6qPs332KLxDbjug2BSEdRpsrRxdNedRYJQRFTml>, also available at Younis Tirawi, @ytirawi, Tweet (8:57 pm, 25 June 2024), <https://x.com/ytirawi/status/1805676646953107848>.

and extremely painfully against the Gazans and all those who wish us harm. Disproportionate vengeance carries great weight in the middle east.”¹¹⁷

15. Areas of Gaza under Israeli evacuation order, in particular, are treated as “kill zones” or “extermination zones” in which all remaining Palestinians are considered by Israeli soldiers to be legitimate targets.¹¹⁸ As made clear by **Commander of the 931st Infantry Battalion of the Israeli army’s Nahal Brigade, Colonel Oz Meshulam**,¹¹⁹ and as confirmed by a whistle-blowing Israeli army reservist, “anyone who is in our combat space is a terrorist and we had no doubt about them”,¹²⁰ including “anyone the IDF has killed in the areas in which its forces operate”.¹²¹ Another such soldier described the operative rules of engagement as follows:

“... there is a moment you realize it’s a freaking actual house, it just, just got completely destroyed. And I don’t know, but there probably were some people in there, maybe there are terrorists, maybe there are not, or Hamas, whatever, but you don’t know. And then you start asking yourself: are all of those strikes — air strikes — necessary? Or are we just having a light hand on the trigger here? And then it starts and once it starts it never stops...”

A lot of people are happy to see that we’re, you know, we’re paying back. That’s like the Israeli retaliation ... a lot of them don’t draw the line between what we call militants or terrorists and what we would call civilians ... they say, like, all of them are part of it, like they all support it ... for many of the people around me, that was the thing. It came from saying ‘you know, you know those are the kids that we spared in the war in 2014’, right — those are the kids that we spared then [that] are now the terrorists that did the seventh [of October] ... I don’t want to say the majority but it was alarmingly widespread in the people around me talking about this.

... no one is batting an eye, no one is questioning. It’s like, it’s a given that if someone is in this area that we are in because everyone was supposed to be evacuated, if someone is there, they are Hamas ... there was a guy holding something white or having a white t-shirt ... he was approaching one of the places where one of the units was, and then the soldiers start yelling in Arabic like ‘stop, stop or I will shoot you’, and then the person starts running away and then he [the soldier] shoots them and kills them, and then you ask yourself: ‘did we just kill someone who was just, you know, trapped in the situation?’ ... I don’t remember anyone talking about that [killing], I think the thing here is they need to prove they are not the enemy, the ground assumption is that they are Hamas ...

... for sure, like celebrating destruction [was a common attitude] and, many people were very happy of that. They feel like, this is the payback ...

... [they would say] ‘here are no uninvolved, only unarmed’ ... I heard it from a few people [and] it became like common in specific circles.”¹²²

¹¹⁷ Maj. Amnon Bahat, Facebook (16 December 2023), https://www.facebook.com/amnonbahat/posts/pfbid02KeQJzSKzVsemDoxhZmAVxrHvxgtZVYpVT2nZrkB1KNDmk8Rg6LPQAg6iq1m3gCq7l?locale=he_IL.

¹¹⁸ Yaniv Kubovich, “Israel Created ‘Kill Zones’ in Gaza. Anyone Who Crosses Into Them Is Shot”, *Haaretz* (31 March 2024), <https://www.haaretz.com/israel-news/2024-03-31/ty-article-magazine/.premium/israel-created-kill-zones-in-gaza-anyone-who-crosses-into-them-is-shot/0000018e-946c-d4de-afec-f46da9ee0000>; Yaniv Kubovich, “‘No Civilians. Everyone’s a Terrorist’: IDF Soldiers Expose Arbitrary Killings and Rampant Lawlessness in Gaza’s Netzarim Corridor”, *Haaretz* (18 December 2024), <https://www.haaretz.com/israel-news/2024-12-18/ty-article-magazine/.premium/idf-soldiers-expose-arbitrary-killings-and-rampant-lawlessness-in-gazas-netzarim-corridor/00000193-da7f-de86-a9f3-feff2e50000>. See also Belén Fernández, “Gaza is one big ‘kill zone’”, *Al Jazeera* (5 April 2024), <https://www.aljazeera.com/opinions/2024/4/5/gaza-is-one-big-kill-zone>.

¹¹⁹ Dov Eichenwald, “‘We are the landlords here’: inside the axis bisecting the Gaza Strip”, *Ynet* (23 February 2024), <https://www.ynet.co.il/news/article/yokra13806889>.

¹²⁰ *Ibid.*

¹²¹ Yaniv Kubovich, “Israel Created ‘Kill Zones’ in Gaza. Anyone Who Crosses Into Them Is Shot”, *Haaretz* (31 March 2024), <https://www.haaretz.com/israel-news/2024-03-31/ty-article-magazine/.premium/israel-created-kill-zones-in-gaza-anyone-who-crosses-into-them-is-shot/0000018e-946c-d4de-afec-f46da9ee0000>.

¹²² “Israeli soldier speaks out on war in Gaza”, *Channel 4 News* (23 April 2024), <https://www.youtube.com/watch?v=Aa-VDAjL8vM>.

16. These soldiers' statements indicate that the rules of engagement are abandoned by Israeli such that targeting civilians and civilian objects is expressly permitted. This has been further advocated for as well as confirmed by Israeli soldiers who fought in Gaza, stating that "Once, a rabbi from Kiryat Arba in the West Bank said we need to destroy and shoot everyone, and that the IDF's [rules of engagement] ethics are a 'distorted Western morality' and that the intention was 'we need to kill everyone'".¹²³ Further statements include:

- On 19 November 2023, **Sergeant First Class of the Combat Engineering Corps of the Israeli military, Hezi Gilboa**, posted on social media in relation to a video depicting widespread military destruction in Gaza: "This is a video of our method for house demolition: We work in the form of 'bites' in the house which expose the house's front, we look for suspicious things — tunnels, weapons, suitcases. When we find [something], we call the senior commanders and when there is nothing [there], we complete the demolition and flatten everything".¹²⁴
- On 12 October 2023, **Israeli officer of the 6261st Battalion, Aviad Yisraeli** — an Israeli settler from the illegal outpost of Tekoa, near Bethlehem in the West Bank — posted on Facebook: "Last night our brigade commander spoke with us. Together we all vowed to not return home until the job of . . . destroying our enemies is fulfilled. And he promised us that the rules have changed. As our commander he made it clear that we are going to bring the wrath of God down on Gaza before we step foot in there and that we will make sure there is no one left to regret the day they attacked innocent Israelis in their homes. I really hope he can stand by his promise. We all intend on standing by ours".¹²⁵ On 18 October 2023, he further explained that according to those new rules "[a]ll targets in Gaza are legitimate. We are at war, and we will win this war in any way we see fit. Any and all civilian casualties are Hamas' responsibility . . . All hospitals in Gaza are legitimate targets . . .".¹²⁶

17. The sheer scale of the death and injury in Gaza — with 145,738 Palestinians either killed or injured by November 2024;¹²⁷ the extensive evidence of summary executions of civilians, including of those waving white flags;¹²⁸ and the near complete destruction of Gaza, stand as further evidence of this interpretation and

¹²³ David Issacharoff, "Resisting the 'Ecstasy of War': Gaza Through the Eyes of Religious, Left-wing Israeli Soldiers", *Haaretz* (15 April 2024), <https://www.haaretz.com/israel-news/2024-04-15/ty-article-magazine/.premium/resisting-the-ecstasy-of-war-gaza-through-the-eyes-of-religious-leftist-israeli-soldiers/0000018e-ce86-d283-a5ee-fe9ff47e0000>.

¹²⁴ Younis Tirawi, @ytirawi, Tweet (2:27 am, 16 May 2024), <https://x.com/ytirawi/status/1790901748346867875>.

¹²⁵ Aviad Yisraeli, Facebook (12 October 2023), <https://www.facebook.com/aviad.yisraeli/posts/pfbid025mdiYDKsBd6eqD2ijAXeTSse8zRiLQ5S17f7LduYxzu9UDTx4WFG3S9Ny6U1xy57l>, also available at Younis Tirawi, @ytirawi, Tweet (11:16 pm, 24 May 2024), <https://x.com/ytirawi/status/1794115208950288829>.

¹²⁶ Aviad Yisraeli, Facebook (18 October 2023), <https://www.facebook.com/aviad.yisraeli/posts/pfbid02ZifGFhF4CnqZRQEHg3qH6V2GNLuC4SvYoktKWd6G3Q5nom8482dEMVnHZkanfoCl>.

¹²⁷ UN OCHA, *Reported impact snapshot | Gaza Strip (5 November 2024)* (5 November 2024), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-5-november-2024>.

¹²⁸ "Palestinians killed waving white fabric: Israeli army shoots two unarmed men dead", *Al Jazeera English* (28 March 2024), <https://www.youtube.com/watch?v=rjYudMS3q1s>. See "Gaza drone video shows killing of Palestinians in Israeli air attack | Al Jazeera Newsfeed", *Al Jazeera English* (22 March 2024), https://www.youtube.com/watch?v=DhVV2_mub84, see also "لجزة لاجزة", *Al Jazeera Arabic* (4 April 2024), <https://www.youtube.com/watch?v=65Dhs8Wslgl>. See also Younis Tirawi, @ytirawi, Tweet (10:26 pm, 8 March 2024), <https://twitter.com/ytirawi/status/1766198872253108684> (the Palestinian man killed by soldiers was later reported by Al Jazeera to have been deaf and mute 73-year old Atta Ibrahim Al-Muqayad, see "شاهد حدي غلجيزر قتل جنود الاحتلال من فلسطيني أعزل", *Al Jazeera Arabic* (8 March 2024), https://www.youtube.com/watch?v=mDU5x_iOPKE). See also "Gaza white flag shooting: ITV News analyses how the incident unfolded frame-by-frame", *ITV News* (18 April 2024), <https://www.itv.com/news/2024-02-09/gaza-white-flag-shooting-itv-news-analyses-how-the-incident-unfolded>. See also Clarissa Ward *et al*, "She was fleeing with her grandson, who was holding a white flag. Then she was shot", *CNN* (26 January 2024), <https://www.cnn.com/2024/01/26/middleeast/hala-khreis-white-flag-shooting-gaza-cmd-intl/index.html>. See also "Entwined in death: Two brothers shot dead in Gaza while evacuating with white flag | ITV News", *ITV News* (3 February 2024), <https://www.youtube.com/watch?v=47Wn7U3G1xI>. See also "Families left with memories of cousins killed by Israeli snipers", *Al Jazeera* (14 February 2024), <https://www.aljazeera.com/program/newsfeed/2024/2/14/families-left-with-memories-of-cousins-killed-by-israeli-snipers>.

application in Gaza of the rules of engagement and of the abuse of fundamental international humanitarian law principles of distinction, necessity and proportionality, as well as the concepts of safe zones and evacuations.

Israeli Soldiers Calling for and Undertaking the Total Destruction and Erasure of Gaza

18. Israeli senior officers and soldiers have openly and explicitly called for the total destruction, erasure, and wiping out of Gaza.¹²⁹ Echoing the Israeli Prime Minister's identification of "total victory", and "ensuring that Gaza never again constitutes a threat to Israel",¹³⁰ senior officers and soldiers openly and explicitly state that their goal is to destroy the prospect of Palestinian life in Gaza, with nobody in Gaza being "uninvolved". The following statements are illustrative:

- On 9 October 2023, **Colonel Rabbi Tsachi Fenton** posted on Facebook, attaching a picture of destruction in Gaza: "This is how all of the Gaza strip and Lebanon will look".¹³¹ On 13 October 2023, he posted "Gaza will be Azallel (hell)".¹³²
- On 26 October 2023, **Colonel Daniel Rod** re-posted a picture of the widespread destruction of buildings in Gaza on Facebook stating "There is no Pearl Harbor without Hiroshima!", with the caption under the picture "Let every Arab mother know".¹³³
- On 7 October 2023, **Lieutenant Colonel Yitzhak Pier from the Adjutant Corps of the Israeli army** wrote on Facebook: "Dear army! Stop showing us bombardments of Gaza, you've been doing this for years and nothing. Don't stop bombing until Gaza is erased. At least now after your disgrace you'll shut up and work."¹³⁴
- On 10 October 2023, **Lieutenant Colonel David Levi** incited the incessant bombarding of Gaza, stating: "Do not stop, not even for a second, until the complete destruction of the entire terrorism Strip in Gaza. Till the end, thoroughly, systematically, and without any emotion or sentiment".¹³⁵ In October 2023 he further said, at different dates: "I don't accept the statement that 'Gaza will not return to what it was.' Action must be taken so that Gaza no longer exists!! No buildings, no people"¹³⁶ and that "... the people of Israel will rise and united will win! Gaza will be destroyed!",¹³⁷ and called for "[D]ismantlement and annihilation! All of Gaza. . . [a]ll of it. Emotionlessly, in any way, by any means. . . [u]ntil the end".¹³⁸ On 1 November 2023, he continued his incitement, stating: "Just don't tell me: 'we are not like them'. . . Our values should only serve us, our people, our children . . . to defend them and take revenge! Nothing but the total destruction of Gaza! Without emotion,

¹²⁹ See also Younis Tirawi, @ytirawi, Tweet (1:14 pm, 6 January 2025), <https://x.com/ytirawi/status/1876240832438677528>; Younis Tirawi, @ytirawi, Tweet (1:18 pm, 6 January 2025), <https://x.com/ytirawi/status/1876242055321796921>. Also available at "The destruction of the 'Officer's Neighborhood' in Beit Hanoun | Noam Amir with the details", *Channel 14* (5 January 2025), <https://www.youtube.com/watch?v=7dcCvT28A6Q>.

¹³⁰ Israel Prime Minister's Office, *PM Netanyahu to the Students of the Bnei David Institutions in Eli: "The testament of the fallen is our mission – total victory."* (30 January 2024), <https://www.gov.il/en/departments/news/event-visit300124>.

¹³¹ Younis Tirawi, @ytirawi, Tweet (12:28 pm, 9 June 2024), <https://x.com/ytirawi/status/1799750494937555326>.

¹³² Younis Tirawi, @ytirawi, Tweet (12:30 pm, 9 June 2024), <https://x.com/ytirawi/status/1799750867543077240>.

¹³³ Col. Daniel Rod, Facebook (26 October 2023), <https://www.facebook.com/daniel.rod.5/posts/pfbid02oaUJVtHvQJWA7FGpFAtokKpLSVkuA7X5pZrj83aWs4oQ7MrsjyL4VKnW3ScdddLML>, also available at Younis Tirawi, @ytirawi, Tweet (11:54 pm, 9 June 2024), <https://x.com/ytirawi/status/1799741771729289285>.

¹³⁴ Younis Tirawi, @ytirawi, Tweet (13:43 pm, 11 May 2024), <https://x.com/ytirawi/status/1789260017062879569>.

¹³⁵ Younis Tirawi, @ytirawi, Tweet (7:28 am, 19 June 2024), <https://x.com/ytirawi/status/1803298835533340696>.

¹³⁶ *Ibid.*

¹³⁷ Younis Tirawi, @ytirawi, Tweet (7:38 am, 19 June 2024), <https://x.com/ytirawi/status/1803301225942712516>.

¹³⁸ *Ibid.*

without sentiment . . . We will be crueller than them and we will prevail, G-d willing".¹³⁹ Similarly, in April, at different dates, he said, "There is still a lot [left] to destroy in Gaza!"¹⁴⁰ and "Part one! We will continue until total destruction. To all the doubters . . . Patience and nerves of steel".¹⁴¹ In June 2024, footage was posted of the Lieutenant Colonel stating: ". . . Don't mess with the Jews, for our national pride, in memory of children, women, elderly, combatants, a wonderful human treasure which is gone and was murdered by two-legged animals from among the Arabs, who are nicknamed 'Palestinians' via a historical lie. Gaza will be destroyed. Only total destruction will convey the message to others who seek to kill the Jewish people. We will take revenge upon you. We haven't even started this revenge. Just you wait."¹⁴²

- On 22 October 2023, **Lieutenant Colonel Shmuel Yagodaev** posted pictures of the destruction of Gaza, accompanied with the text “Gaza [Strip], you look best in black . . .”.¹⁴³ On 4 April 2024, he commented on a time-lapse image showing the wiping out of the Shifa Hospital area, saying, “The Gaza Strip after a ‘facelift’ procedure, there’s still more work to do . . .”.¹⁴⁴
- On 28 October 2023, the **Head of the Israeli military’s Air Operations Group, Lieutenant Colonel Gilad Kinan**, described the Israeli Air Force as “working together with all IDF bodies with a clear goal — destroy everything touched by Hamas’s hand”.¹⁴⁵ Lieutenant Colonel Gilad Kinan issued the statement on the day Israel launched its ground invasion of Gaza.¹⁴⁶
- On 8 November 2023, **Lieutenant Colonel Haim Har-Zahav** posted: “I really don’t understand how there are still buildings standing in Northern Gaza, everything should be flattened down to the sand, even if there are no terrorists there and moreover, I would disable all the tractors they use for clearing the debris, who allows clearing during wartime”.¹⁴⁷
- On 7 December 2023, **Lieutenant Colonel Yair Maen** commented, with celebratory words, on footage of burning homes in Gaza, “Happy Hanukkah, [t]he first candle is lit in Gaza”.¹⁴⁸ On 17 December and 29 December 2023 respectively, he posted footage of the sunset over destroyed Gaza infrastructure accompanied by the text “Gaza is setting”,¹⁴⁹ and commented on footage of

¹³⁹ Younis Tirawi, @ytirawi, Tweet (7:44 am, 19 June 2024), <https://x.com/ytirawi/status/1803302800161448263>.

¹⁴⁰ Younis Tirawi, @ytirawi, Tweet (7:55 am, 19 June 2024), <https://x.com/ytirawi/status/1803305687931314238>.

¹⁴¹ *Ibid.*

¹⁴² Younis Tirawi, @ytirawi, Tweet (7:22 am, 19 June 2024), <https://x.com/ytirawi/status/1803297399013576772>.

¹⁴³ Lt. Col. Shmuel Yagodaev, Facebook (22 October 2023), https://www.facebook.com/permalink.php?story_fbid=pfbid04qEThiUsrCfnjaY6qMQ7fDELzi1KtB5UM16VwKBX3uKj7EBECfSPvY1JC3fXzV1&id=100030738703697, also available at Younis Tirawi, @ytirawi, Tweet (10:43 am, 7 June 2024), <https://x.com/ytirawi/status/1798999255107223694>.

¹⁴⁴ Lt. Col. Shmuel Yagodaev, Facebook, <https://www.facebook.com/reel/271430752703333>. See also available at Younis Tirawi, @ytirawi, Tweet (11:02 am, 7 June 2024), <https://x.com/ytirawi/status/1799004038203404566>.

¹⁴⁵ Israel Defense Forces, @idfonline, Tweet (7:23 am, 28 October 2023), <https://twitter.com/idfonline/status/1718136442805686351>.

¹⁴⁶ James Mackenzie and Maayan Lubell, “Israel launches Gaza war’s second phase with ground operation, Netanyahu says”, *Reuters* (28 October 2023), <https://www.reuters.com/world/middle-east/eu-calls-humanitarian-pauses-gaza-aid-israel-raids-enclave-2023-10-26/>.

¹⁴⁷ Lieutenant Colonel Haim Har-Zahav, Facebook (7 November 2024), https://www.facebook.com/permalink.php?story_fbid=pfbid027WGB5wfQgNoefXUq5C2o9UofjdbBeaW3d5vNVnKovrXC2VM2Y6BXTxsZfpJMWXNFI&id=100002310278578, also available at Younis Tirawi, @ytirawi, Tweet (11:51 am, 7 June 2024), <https://x.com/ytirawi/status/1799016314561794472>.

148 Lt. Col. Yair Maen, Facebook (7 December 2023), https://www.facebook.com/permalink.php?story_fbid=pfbid0VE7MifuU73eKA25bhPLvKyTTVYV8wywTsQQA5mgwiJLWXeV4bZa7YVNiEKokFXC9l&id=61551909674772, also available at Younis Tirawi, @ytirawi, Tweet (12:21 pm, 30 May 2024), <https://x.com/ytirawi/status/1796124832834166957>.

¹⁴⁹ Lt. Col. Yair Maen, Facebook (17 December 2023), https://www.facebook.com/permalink.php?story_fbid=pfbid0ZTHc7fHfWJ3gMq4GVFNpFPNNZATFL0uAq7nymjTiKeD8yoh2Vay5KwbUJaC9Zj1Npl&id=61551909674772, also available at Younis Tirawi, @ytirawi, Tweet (12:26 pm, 30 May 2024), <https://x.com/ytirawi/status/1796126116823925134>. Translator Note: the original Hebrew is a pun that means ‘Gaza is sinking’ as well as ‘the Gazan sunset’. Translation is a suggestion aimed at keeping both meanings.

burning buildings with the sound of Palestinians screaming in Gaza with “A volcano in Gaza”.¹⁵⁰

- On 17 February 2024, **Lieutenant Colonel Shauli Sanker**, posted on Facebook: “. . . [a]ny end of the war that isn’t the elimination of Hamas and total destruction of the Gaza strip is a prize and encouragement for terrorism, and the shortest path to the next massacre. Have we forgotten the awful massacre in the [Gaza] Envelope? . . . Stop closing your eyes. Our war is not with Hamas but with the Palestinian people. Not only should we refuse to make peace with a nation of murderers and rapists, but rather we should fight it everywhere. Whoever thinks Judea and Samaria are not Gaza is simply burying their head in the sand. Tulkarem and Jenin are the same as Gaza and Khan Younis. Without an aggressive, lethal manoeuvre in Judea and Samaria after Gaza — we lose the element of deterrence and our fate is sealed.”¹⁵¹
- On 5 March 2024, **Lieutenant Colonel Eyal Shalit-Snir**, who served in Gaza¹⁵² and according to him “command[s] the aid convoys that enter Gaza daily”,¹⁵³ responded to a post on X with: “[t]ogether we will win, together we will destroy Gaza, together we will eliminate all the enemies, together! We have no families and acquaintances in Gaza. All the Gazans are enemies who are sentenced to death or surrender or emigration. . . All of Gaza will be destroyed!”.¹⁵⁴ On 5 April 2024, he posted on X that “Gaza is Hamas and Hamas is Gaza. Everyone in Gaza supported and are still supporting Hamas. Gaza must be destroyed. . .”.¹⁵⁵
- On 24 May 2024, only hours after the International Court of Justice’s Provisional Measures Order of 24 May 2024, **Lieutenant Colonel Tal Bibi, senior officer and Commander in the Nahal Brigade**, called for the Israeli army to burn Gaza, stating “If Gaza is not burned in fire woe to us, woe to us, shame and disgrace to us as a country . . . [‘zero’]-mercy to the evil doers and their families!!!!”.¹⁵⁶ He had previously stated, in October 2023, that “Gaza should be erased. . . How to erase????” and advocated for the Israeli army to do so “by bombarding with the Salami method [using multiple small actions to achieve a larger action or result] — when anyone who doesn’t take themselves and leave — gets hit. And we will continue with the total cleansing of all of Gaza. Those who survive, good; and those who don’t, it is what it is. Friends — the war is existential!!!! Either them or us !!!! . . . Gaza = dust!! Good luck”.¹⁵⁷

¹⁵⁰ Lt. Col. Yair Maen, Facebook, <https://www.facebook.com/reel/280397301351140>, also available at Younis Tirawi, @ytirawi, Tweet (12:25 pm, 30 May 2024), <https://x.com/ytirawi/status/1796125796412559626>.

¹⁵¹ Lt. Col. Shauli Sanker, Facebook (17 February 2024), <https://www.facebook.com/shauli.sanker.1/posts/pfbid0p4CgCBBXL3u1iBdsVTVCZc5Vpe4cVnm6pYfzsN1kqffzpKJrrmwPhUXEs7bFgcCl>, also available at Younis Tirawi, @ytirawi, Tweet (9:57 pm, 4 June 2024), <https://x.com/ytirawi/status/1798081596077322686>.

¹⁵² Younis Tirawi, @ytirawi, Tweet (11:53 pm, 13 September 2024), <https://x.com/ytirawi/status/1834712034815987864/photo/1>.

¹⁵³ Younis Tirawi, @ytirawi, Tweet (11:22 pm, 13 September 2024), <https://x.com/ytirawi/status/1834704137298100719>. See original at Eyal Shalit Snir, @ShalitEyal, Tweet (11:00 pm, 28 April 2024), <https://x.com/ShalitEyal/status/1784689125947211963>: “Listen you idiot [lit. donkey]. I’m the commander of the aid convoys that enter Gaza daily. There is no hunger there. You are a lying demagogue, an idiot that doesn’t understand how the court in the Hague works and what its goals are. It would be better that you and the rest of those collaborating with the enemy in your [political] camp disappear because the damage you cause is worse than the one Hamas causes. Truly an idiot, shut up.”

¹⁵⁴ Eyal Shalit Snir, @ShalitEyal, Tweet (2:46 am, 5 March 2024), <https://x.com/ShalitEyal/status/1764814622878486607>.

¹⁵⁵ Eyal Shalit Snir, @ShalitEyal, Tweet (9:11 am, 5 April 2024), <https://x.com/ShalitEyal/status/1776326921485234583>.

¹⁵⁶ Lt. Col. Tal Bibi, Facebook (19 October 2023), <https://www.facebook.com/talbibi1/posts/pfbid02WeSTXVy3xbBVmFuP5qM4SqdxLjRxVPF8qShaC4mm8kZK9xAuNMuKs2V4SNoJZDCI>, also available Younis Tirawi, @ytirawi, Tweet (8:17 pm, 27 May 2024), <https://x.com/ytirawi/status/1795157310555226121>.

¹⁵⁷ Lt. Col. Tal Bibi, Facebook (12 October 2023), <https://www.facebook.com/talbibi1/posts/pfbid0x8Gj7DwU5z6C8XgMTzQykhQMHRs1TjUUCe3uSXRjSXAHBEEQpmLkWKYzPJCbhC6al>, also available at Younis Tirawi, @ytirawi, Tweet (8:24 pm, 27 May 2024), <https://x.com/ytirawi/status/1795159276828127252>.

- On 9 June 2024, **Lieutenant Colonel Avitar Elbaz**, posted on Facebook his exasperation with Israeli protestors for the release of the hostages and a ceasefire, calling also for the further destruction of Gaza: “True hypocrisy! If we want to reach the hostages we need to fight to the end... Destroy the enemy and no matter what the outcome [will be], the main thing [is] to carry out war[,] destroy Gaza...”¹⁵⁸
- On 4 August 2024, **Lieutenant Colonel Eli Zilberman, from the Givati Brigade**, reposted a video on his YouTube channel which included excerpts of a documentary filmed in Gaza in which he was interviewed, and affirmed the Israeli military’s total destruction of Gaza saying the following “. . . Revenge is a big word. Revenge doesn’t lead to victory. First, not one of the people who did it [October 7th massacre] will live; Second, walk around, film it, take a look at what is going on here behind [me]. Gaza did not remain. There is almost not one single house you can live in . . .”.¹⁵⁹
- On 18 August 2024, **Lieutenant Colonel and Senior Commander Yakhin Zik of the Yiftach Brigade** ‘tweeted’: “Other than that, I believe that Gaza should be erased.”¹⁶⁰
- On 18 December 2024, **Lieutenant Colonel Ran Cohen, deputy commander of the Kfir Brigade**, serving in Gaza, stated in a documentary aired on Israeli television: “By the end of our mission Beit Lahia will be annihilated with all the infrastructure, both above & below ground”.¹⁶¹
- On 10 October 2023, **Israeli army senior officer, Major and Deputy Commander on the 35th Paratrooper Brigade, Amit Deri**, posted on Facebook: “. . . Gaza should be destroyed. All of it. Every building [,] every house [,] every school, and also the Shifa hospital. Ben Gvir doesn’t say this. Major Giora Eiland says this [*sic.*; should be ‘said this’] a moment ago on Galey Tzahal [Israeli Army Radio]. Give a short number of hours for Gaza residents to evacuate themselves to Egypt or to the coastline outside of the houses and immediately begin the work. It doesn’t take long!! With intensive Air Force activity it’s a matter of several days. There is no other way.”¹⁶²
- On 12 October 2023, **Major Yaniv Benami** posted on Facebook: “Scorched earth[.] Changing the paradigm means doing something that wasn’t done before and therefore using means that were not seen here with an assault plan that wasn’t seen here.”¹⁶³
- On 18 October 2023, **Major Avrum Tomer** posted on Facebook: “. . . let the government harness the economy to create enough dumb or smart weapons with enough explosives, enable whoever want to flee the battle zones to escape inside the Strip or outside of it, and turn the Gaza Strip and maybe also parts of

¹⁵⁸ Lt. Col. Avitar Elbaz, Facebook (9 June 2024), https://www.facebook.com/permalink.php?story_fbid=pfbid0cu2w1HFhe7ggaro3nwBFdgKmazUoTqyg55uM2TMwDSzW8ACYu82pBssfLz6c7W511&id=100005607367519, also available at Younis Tirawi, @ytirawi, Tweet (2:16 pm, 15 June 2024), <https://x.com/ytirawi/status/1801951955419369855>.

¹⁵⁹ “Lions on Tigers: Lieut. Col. (in reserve) Eli Zilberman on the fierce fighting”, *Eli Zilberman* (4 August 2024), <https://www.youtube.com/watch?v=HaBdh8HWxUM>, excerpt extracted and posted by Lt. Col. Eli Zilberman from “Individuals of virtue: dramatic documentation of the Givati Brigade in the south of the Gaza Strip, Hallel Biton Rosen’s Film”, *Channel 14* (17 February 2024), <https://www.youtube.com/watch?v=Ij-ZbxNvEtQ&t=921s> [11:11-12:26].

¹⁶⁰ Yakhin Zik, @yakhinzik, Tweet (8:56 pm, 18 August 2024), <https://x.com/yakhinzik/status/1825245296164479425>, also available at Younis Tirawi, @ytirawi, Tweet (3:08 pm, 20 October 2024), <https://x.com/ytirawi/status/1847988260162736444>.

¹⁶¹ Younis Tirawi, @ytirawi, Tweet (11:27 am, 19 December 2024), <https://x.com/ytirawi/status/1869706222984990944>.

¹⁶² Younis Tirawi, @ytirawi, Tweet (2:13 pm, 21 May 2024), <https://x.com/ytirawi/status/1792891418370781395>, also available at Amit Deri, Facebook (10 October 2023), <https://www.facebook.com/amit.deri.9/posts/pfbid021fh8gZUjdpjeYY1EAZ2vg65pvZjHJBXBvfH421FDxryS3oLbFnfdeLvn8mBG1ynYl>.

¹⁶³ Maj. Yaniv Benami, Facebook (12 October 2023), <https://www.facebook.com/benamiy/posts/pfbid02nhruGydA6Zoh1fGAYm6oYT1cv4DimUxDigbBNNiPfaGxpQj1kcBW5y9ifiAseanul>, also available at Younis Tirawi, @ytirawi, Tweet (1:01 am, 7 October 2024), <https://x.com/ytirawi/status/1843064037321347139/photo/1>.

Lebanon to rubble, from the sea, air and land. Whoever doesn't support this from the outset — don't bother trying to win their support at all. No proportions, no nothing. Everything until absolute victory.”¹⁶⁴

- On 20 October 2023, **Major Tsurial Rashi** posted on Facebook: “. . . In my view, Gaza's residents today are becoming more and more similar to the German population, who witnessed and rejoiced in the death of Jews and the imprisonment of innocents. That is why we have to reach a situation where the Gazan population and the Arab world will be like the Egyptians after the death of their firstborn sons: 'The Egyptians urged the people on, impatient to have them leave the country, for they said, "We shall all be dead."' [Exodus 12:33]. The feeling among the enemy was that there was no home without a victim, and if they don't stop quickly, everyone will die. Hamas called its assault Tufan al-Aksa, the Flood of al-Aksa. The flood which appears in many mythologies is found in the Muslim heritage too, and the Palestinians understand the story and its lessons well. The IDF is speaking to the Palestinian and Arab public using the term 'Tufan al-Gaza' — a flood on Gaza. Which is to say that the flood they had planned will sweep them away. . . .”¹⁶⁵
- On 23 October 2023, **Major Udi Tenne** stated: “[t]here are over 200 hostages of ours in Gaza. The State of Israel should announce that every day the hostages don't return [they] take down 200 buildings there. If there are no hostages, let there be no Gaza”.¹⁶⁶ On 20 December 2023 he posted: “This time we don't need to wait for the allies to free us from the Nazis. Let[']s go tear Gaza apart now.”¹⁶⁷
- On 9 November 2023, **Major Meir Liosh, a radio host on Israeli Army Radio**, posted on Facebook: “*Trigger Warning* The testimonies about the rape and executions in the massacre of October 7 are exactly what I wrote here from the beginning . . . what happened in the Gaza Envelope has never happened in the modern world. Revenge on an unprecedented scale is the only solution. Gaza needs to be destroyed”.¹⁶⁸ He had previously posted on 10 October 2023: “Good morning and #destroy_Gaza”,¹⁶⁹ and on 8 October 2023 called to “#Destroy_Gaza”.¹⁷⁰ On 7 October he said: “. . . Gaza needs to be destroyed. Inch by inch”.¹⁷¹
- On 24 November 2023, **Major Asaf Fried** posted a picture accompanied by *inter alia* the following text: “. . . In the picture: the division's action last night

¹⁶⁴ Maj. Avrum Tomer, Facebook (18 October 2023), <https://www.facebook.com/avrum.tomer/posts/pfbid0mmdZunHYSTT89gvQy5CW1cYMsiZXtMVmwu9Ky2GRTgaxpc2ezM8TCF1C4oyy8Rr6l>, also available at Younis Tirawi, @ytirawi, Tweet (10:53 am, 4 June 2024) <https://x.com/ytirawi/status/1797914510734340170>.

¹⁶⁵ Maj. Tsurial Rashi, Facebook (19 October 2023), <https://www.facebook.com/tsuriel.rashi/posts/pfbid02QihHVVYd713g3tnnHn7gFXEJm3d8MkxxwSwWhEut5b7WxYZZptphWgX9AB8vsFoevel>, also available at Younis Tirawi, @ytirawi, Tweet (4:08 pm, 12 July 2024), <https://x.com/ytirawi/status/1811764586237829423>.

¹⁶⁶ Udi Tenne, @UdiTenne, Tweet (8:34 pm, 23 October 2023), <https://x.com/UdiTenne/status/1716523536880115958>, also available at Younis Tirawi, @ytirawi, Tweet (5:24 pm, 28 June 2024), <https://x.com/ytirawi/status/1806710284012134538>.

¹⁶⁷ Udi Tenne, @UdiTenne, Tweet (2:59 pm, 20 December 2023), <https://x.com/UdiTenne/status/1737457747501678883>, also available at Younis Tirawi, @ytirawi, Tweet (5:24 pm, 28 June 2024), <https://x.com/ytirawi/status/1806710284012134538>.

¹⁶⁸ Maj. Meir Liosh, Facebook (8 November 2023), <https://www.facebook.com/meir.layosh/posts/pfbid02iqGFa6vGGdhNwCbqAN9yhpe8jqBuDrxvTC2t9hA9645fKDujUoUQnkyh5HMAi9l>, also available at Younis Tirawi, @ytirawi, Tweet (8:57 pm, 25 June 2024), <https://x.com/ytirawi/status/1805676646953107848>.

¹⁶⁹ Maj. Meir Liosh, Facebook (10 October 2023), <https://www.facebook.com/meir.layosh/posts/pfbid022sH9YUfodAiRg1VjEVg6YkMfw76kLuM2x35uLn2813unKuMBucCdp4QKWY5osiJl>, also available at Younis Tirawi, @ytirawi, Tweet (8:57 pm, 25 June 2024), <https://x.com/ytirawi/status/1805676646953107848>.

¹⁷⁰ Maj. Meir Liosh, Facebook (8 October 2024), <https://www.facebook.com/meir.layosh/posts/pfbid0LMWpZ7S2fVQrGDogFSS82i7MLDWMhCa7FhAGowaiYQPmRclY3zD4Dcf2MrE7WzWhl>, also available at Younis Tirawi, @ytirawi, Tweet (8:57 pm, 25 June 2024), <https://x.com/ytirawi/status/1805676646953107848>.

¹⁷¹ Maj. Meir Liosh, Facebook (7 October 2024), <https://www.facebook.com/meir.layosh/posts/pfbid02vNwWN6bNsUm3aVocZQfEvAXQXP9k3eD2bdNmKDDT3xmAvag9ckhqDvsaxDqVfdQv1>, also available at Younis Tirawi, @ytirawi, Tweet (8:57 pm, 25 June 2024), <https://x.com/ytirawi/status/1805676646953107848>.

in Jabalia (picture from Arab sources). For those who fear the enemy population will return to the northern Gaza Strip, don't worry, they have nowhere to return to".¹⁷² On 1 January 2024 he posted: "Gaza, at the end of the war, will be managed by the Nature and Parks Authority."¹⁷³

- On 20 December 2023, **Major Yaakov Madi, of the 828th ('Bislamach') Infantry Brigade**, posted a video of extensive demolitions of homes in Shuja'iyya, stating: "Glad to belong, Brigade 828 World Champions 🤍". In the video, a soldier can be heard saying "Brigade 828 says farewell to Shujaiyeh. This is where victory begins."¹⁷⁴ One day later, he posted — commenting on a soldier from another Battalion going back to Gaza: "... a pause for refresh and back to Gaza. G-d willing we pray Gaza will be wiped from the face of the earth. Our parachutist, battalion 890 🤍 🤍 🤍 we meet at last 🤍 🤍 🤍 ...".¹⁷⁵ On 20 May 2024, he said he was on his way to Gaza for his "third round", posting: "Third round here we go. . . With G-d's help, the people of Israel will win. . . [We are] erasing [sic] Gaza. @Eliya Sagron".¹⁷⁶ The statements from Captain Eliya Sagron are outlined below in this Annex.
- On 23 December 2023, **Major Ravid Elfassi, a Commander in the 162nd Division** of the Israeli army, gave a podcast interview in which he described the destruction wrought by the Israeli army in Gaza, stating: "... when I make my way back and I see the annihilation we did in Gaza, I wonder to myself if the sons of whores who did this on the 7th of October, thought that this is going to happen to them. This insane destruction and annihilation. You see agricultural projects, hotels, cafes, family homes, villas, huge summer homes . . . Did they know we were going to take apart their city? To annihilate the infrastructure, to destroy . . . they knew that we will come in with tanks, D9s and bulldozers. And they knew that we will come in with F35 planes, and bomb and destroy and kill and annihilate, and they still did it joyfully."¹⁷⁷
- On 6 January 2024, **Major Ilan Arad**, posted on Facebook, "It is important that we all understand and internalize these facts even when we see supposedly poor human beings standing in line to get water. . . The city of Gaza, with all its houses, streets, and symbols, will be physically erased from the face of the earth, and the Gaza Strip will become Israeli forever with all the implications that this recognition entails. No Arab rule of any kind will ever be able to return and exist there after the events of October 7, and woe to us if, as 'humane people' we fall again into this deadly illusion . . .".¹⁷⁸
- On 10 January 2024, **Israeli army medic and paratrooper, Captain Naftali Gross**, who served in Gaza, posted on Facebook that: "[w]e are now standing in the ruins of a neighbourhood in Khan Yunis that once housed one of the most brutal clans in

¹⁷² Maj. Asaf Fried, Facebook (23 November 2023), https://www.facebook.com/permalink.php?story_fbid=pfbid026tzHJxAQVjZY6TnyhcU3HJq1xoiMmufoYz6i3WRp42q5JZEi7Lt24sSRJyzAWR2Hl&id=100000183658777, also available at Younis Tirawi, @ytirawi, Tweet (10:41 pm, 9 June 2024), <https://x.com/ytirawi/status/1799904553757811162>.

¹⁷³ Maj. Asaf Fried, Facebook (1 January 2024), https://www.facebook.com/permalink.php?story_fbid=pfbid034jwskVmWA1ocRJ9JUYfhueLpUbZDTt83KGTd3Bq3HSTWcEg8pemJCf42CnXMmy2el&id=100000183658777, also available at Younis Tirawi, @ytirawi, Tweet (11:01 pm, 9 June 2024), <https://x.com/ytirawi/status/1799909682439454849>.

¹⁷⁴ Maj. Yaakov Madi, Facebook (20 December 2023), <https://www.facebook.com/100000257427410/videos/847326607140914>.

¹⁷⁵ Maj. Yaakov Madi, Facebook (21 December 2023), https://www.facebook.com/permalink.php?story_fbid=pfbid02snPcFbw9ZQn8C9KGksb2BHXZRe2N57NyoEc1CViHxaL4XRtgnahY988VMktVFpful&id=100000257427410.

¹⁷⁶ Maj. Yaakov Madi, Facebook (20 May 2024), https://www.facebook.com/permalink.php?story_fbid=pfbid0zpWXGCH6JrMJXLdfj5oETJkX4b9hDndxv91JLvfLiV2dBJEFCtrmudTo77bzZLNl&id=100000257427410, also available at Younis Tirawi, @ytirawi, Tweet (11:21 pm, 26 May 2024), <https://x.com/ytirawi/status/1794841316792451439>.

¹⁷⁷ "Orchestra #24 What are we actually fighting for? - Or Ilan and Ravid Alfasi", *Or Ilan* (23 December 2023), <https://www.youtube.com/watch?v=Dnhgs3MmsLs>, also available at Younis Tirawi, @ytirawi, Tweet (1:27 am, 22 May 2024), <https://x.com/ytirawi/status/1793061019062849603>.

¹⁷⁸ Maj. Ilan Arad, Facebook (6 January 2024), <https://www.facebook.com/aradaviation/posts/pfbid02KCuCo5pZ14aes8LzMmsQKNdCwP2MYMbCSzDJRwoiUorYAVY4yhCk5RFWRKCreLl>, also available at Younis Tirawi, @ytirawi, Tweet (1:01 pm, 4 July 2024), <https://x.com/ytirawi/status/1808818302933700909/photo/1>.

the city. Our battalion planted mines and blew up the neighbourhood to its foundations as part of the operational plan to control the area. . . ”.¹⁷⁹ Two months later, on 6 April 2024, he posted again on Facebook that he “was present this week to witness once more with my own eyes the meaning of victory”, stating: “[e]very street and every alley, every house and every neighbourhood was searched, plowed, and destroyed in an attempt to find the hostages and destroy the terrorist infrastructure and the terrorists who were hiding here. . . when the residents of Gaza return to Khan Yunis, they will realize their terrible mistake in allowing killers and Hamas men to operate from their homes, from their kindergartens, schools and hospitals. Khan Yunis will not be the same again not in a decade nor in fifty years”.¹⁸⁰

- On 30 January 2024, **Captain Avshalom Slock** stated on Facebook “From there, we moved on to Gaza, shifting from defense to offense. We crushed them the way only tanks can crush. We destroyed them the way only tanks can destroy. We captured all of northern Gaza, the city of Gaza itself, Jabalia. From there, we moved to Khan Younis. We assisted in uncovering tunnels, we cleared areas, we aided in blowing up houses. We led the fighting at every stage, we were the first to break through, the first to attack, the first to occupy, pin down, and destroy. There isn’t a single house left standing in northern Gaza or Khan Younis, not a single street that wasn’t leveled and destroyed.”¹⁸¹
- In March 2024, footage was published of **Captain Roi Azran** stating in a video: “Here’s Gaza. You daughter of a whore. We’ll burn your mother. All of Shujjaia will burn in flames.”¹⁸²
- On 17 February 2024, speaking on Israeli Channel 14 television show ‘the Patriots’, **Sergeant Major of the 84th (Givati) Brigade, Rabbi Avraham Zarbiv** — a judge in the rabbinical court in Haifa and former Head of Beit El pre-military academy in an illegal Israeli settlement in the West Bank,¹⁸³ stationed in Khan Younis for four months¹⁸⁴ — stated that “victory” for Israel would be the whole of Gaza’s “infrastructure being destroyed”.¹⁸⁵ On 7 April 2024, he posted on Facebook: “wherever the IDF soldiers passed through, the earth was left scorched”.¹⁸⁶ On 24 July 2024, he further confirmed in an interview “We simply, with immense forces . . . [are] flattening the Strip . . . we’re talking simply, their Nakba”.¹⁸⁷

¹⁷⁹ Cpt. Naftali Gross, Facebook (10 January 2024), <https://www.facebook.com/naftalig/posts/pfbid0Vz6Ri4V6fgK5nsZXbuA31wnUejWn81gfzuSwFSVHSu3sWTZRuM3F5ceC5YZcyf7U1>, also available at Younis Tirawi, @ytirawi, Tweet (7:43 pm, 3 May 2024), <https://twitter.com/ytirawi/status/1786451581187072369>.

¹⁸⁰ Cpt. Naftali Gross, Facebook (6 April 2024), <https://www.facebook.com/naftalig/posts/pfbid035dTcC7ByLqxu97naZBVVFZJpWQWks1esmK3dggZSAW7agaQUzAEZ4zt8uybevaanl>, also available at Younis Tirawi, @ytirawi, Tweet (7:39 pm, 3 May 2024), <https://twitter.com/ytirawi/status/1786450552508837928>.

¹⁸¹ Avshalom Slock, Facebook (30 January 2024), <https://www.facebook.com/avshalom.sluk/posts/pfbid0Gi34ijUqWnnc6qQb2xEfpR4S8tX5aZmYcbSkLqF9PpKuQoMA7uVJQzpdmoLYdbcWl>, also available at Younis Tirawi, @ytirawi, Tweet (1:55 am, 11 September 2024), <https://x.com/ytirawi/status/1833655644160676235>.

¹⁸² Younis Tirawi, @ytirawi, Tweet (2:31pm, 27 March 2024), <https://twitter.com/ytirawi/status/1772964772629111095>.

¹⁸³ “Strengthen the Bet El Pre-Military Academy”, *Israel National News* (16 May 2018), <https://www.israelnationalnews.com/news/246050?ssr=1>.

¹⁸⁴ Avraham Zarbiv, Facebook (7 April 2024), https://www.facebook.com/permalink.php?story_fbid=pfbid02v5kjQcQ36upyAehXMKVtSKKzw5S83ENQEi3Fc69VoLu3MaiG3tCtD4K85gESrWBl&id=100011062416421, also available at Younis Tirawi, @ytirawi, Tweet (12:59, 8 April 2024), <https://x.com/ytirawi/status/1777108859464700055>.

¹⁸⁵ “The Patriots with Yanon Magal: 17.02.2024 | The full program”, *Now 14* (17 February 2024), <https://www.youtube.com/watch?v=cpafZO-PMmo> [1:20:28], subtitles at Younis Tirawi, @ytirawi, Tweet (10:15 pm, 18 February 2024), <https://twitter.com/ytirawi/status/1759310674142830602>.

¹⁸⁶ Avraham Zarbiv, Facebook (7 April 2024), https://www.facebook.com/permalink.php?story_fbid=pfbid02v5kjoQcQ36upyAehXMKVtSKKzw5S83ENQEi3Fc69VoLu3MaiG3tCtD4K85gESrWBl&id=100011062416421, also available at Younis Tirawi, @ytirawi, Tweet (12:59 am, 8 April 2024), <https://x.com/ytirawi/status/1777108859464700055>.

¹⁸⁷ Now14, @Now14 Israel, Tweet (9:14 pm, 24 July 2024), <https://x.com/Now14Israel/status/1816190155130298794>, also available at Younis Tirawi, @ytirawi, Tweet (12:38 pm, 28 July 2024), <https://x.com/ytirawi/status/1817509852194697391>.

- On 3 December 2023, **Master Sergeant Udi Ben Tora** posted on Instagram “Well, bastards! Was it worth it? You invaded, murdered, desecrated, dismembered, abused, burned, raped, hunted, kidnapped. . . Without any distinction. We don’t forgive and [we] definitely don’t forget. There are apocalyptic images in Gaza and this is only the beginning! Ghost houses, ruins, craters and truly this is just the beginning! We will change your name to “New Tillage” because there is no land we haven’t plowed, turned and will turn again. You were deserving of death [‘bney mavet’, Biblical term describing a person who deserves death or is sentenced to death] and you will be sentenced to death [‘bney mavet’] from this moment onwards — we will not stop tearing you apart!”.¹⁸⁸
- On 6 May 2024, **Master Sergeant Carmi Yogev of the Alexandroni Brigade** posted on Facebook: “For it to be effective and change the situation, Rafah needs to be turned into Dresden. We cannot accept anything less”,¹⁸⁹ and on 5 May 2024, he posted “Enough with the talk, statements and negotiators. . . Rafah and Beirut should burn, and only then will we be able to return the hostages and restore calm to the borders!”.¹⁹⁰
- On 11 October 2023, an **Israeli private in the paratroopers reserve brigade, Yonatan Eisenstein**, posted on Facebook: “Some thoughts of a reserve soldier on a break between missions: . . . The circumstances have created a unique historical opportunity for us to solve the Gazan problem. This is an opportunity that we must not, simply must not, miss. Missing it will be unforgivable and will be a crying shame for generations. The window of opportunity is short and will close soon since the support of Western powers will not last long . . . Here is the general outlines: open the Rafah crossing south to Egypt to allow the Strip’s residents an escape . . . Go through one neighbourhood after another, starting from the north and all the way to the south, announce that the neighbourhood will be destroyed in an hour and the residents must leave . . . Artillery fire and tanks turn the neighbourhood into a parking lot. A parking lot. Just like that. . . After a week there’s no more people living in Gaza. . .”.¹⁹¹
- On 28 October 2023, **Israeli soldier Netanel Ne’man** posted on Facebook: “We will win, and we will erase Gaza”.¹⁹² On 29 October 2023, he posted “Gaza will be erased, and the second stage [will be] to build new Jewish neighborhoods in all of Gaza”.¹⁹³ On 22 November 2023, he stated “Gaza has truly become a pile of rubble. Entire neighborhoods flattened in the northern part of the Strip[.] The time has come, when victory is decisive [and] with great hope that all its [Gaza’s] residents will be exiled, to resettle Jewish settlements in Gaza, and to promote at the end of the decisive victory, with great hope that they will drive out all its inhabitants, to resettle Jewish communities within Gaza, and promote amazing tourism along Gaza’s shores”.¹⁹⁴ On 7 February 2024, he posted: “Our

¹⁸⁸ Younis Tirawi, @ytirawi, Tweet (1:13 pm, 13 May 2024), <https://x.com/ytirawi/status/1789977384042520716>.

¹⁸⁹ Carmi Yogev, Facebook (6 May 2024), <https://www.facebook.com/carmiyogev/posts/pfbid0Xo8rGETirkXs6xfS68U2WqEU5JbqYkxZnXqrv3mV1t7RmFw8ZZmLjErA1W6KcciY1>, also available at Younis Tirawi, @ytirawi, Tweet (11:28 am, 27 July 2024), <https://x.com/ytirawi/status/1817129874865217906>.

¹⁹⁰ Carmi Yogev, Facebook (5 May 2024), <https://www.facebook.com/carmiyogev/posts/pfbid0VXkrBfawsWwPVNrzbE4U5xEjKYQkkBoCX4aUHyi3GDQHTQ9DNxWEzmzabTXoMwZl>.

¹⁹¹ Yonatan Eisenstein, Facebook (11 October 2023), <https://www.facebook.com/yonatan.eisenstein/posts/pfbid0JLf7n5fg7QUBVGHQnxJfWsuXdmHvTxT1PkpjvFbzavSQXvc8t6WyP2AakJuXqD7nl>, also available at Younis Tirawi, @ytirawi, Tweet (3:22 pm, 3 June 2024), <https://x.com/ytirawi/status/1797619841689321711>.

¹⁹² Netanel Ne’man, Facebook (28 October 2023), <https://www.facebook.com/netaneln/posts/pfbid0Pg7XfNMre4oTUygzPUvkP4e4dGdtR9Xb9PehEBekFSW17EKBBz3X2iRkEdpbE9yql>, also available at Younis Tirawi, @ytirawi, Tweet (11:27 pm, 13 July 2024), <https://x.com/ytirawi/status/1812237415324753935>.

¹⁹³ Netanel Ne’man, Facebook (29 October 2023), <https://www.facebook.com/netaneln/posts/pfbid0SeZD7P5zXzSQtLS3PpNarTwfUCwz4HfbEe9P4nkr6SdFGWhHmFLkXmawbjkrfyl>, also available at Younis Tirawi, @ytirawi, Tweet (11:27 pm, 13 July 2024), <https://x.com/ytirawi/status/1812237415324753935>.

¹⁹⁴ Netanel Ne’man, Facebook (22 November 2023), <https://www.facebook.com/netaneln/posts/pfbid02UDrWEMWKPCiXBBwaGpSED4m23utgCiRjxAq6HWA7pi3CA1jaQRnpjM8Bp5uJ6Ht1l>, also available at Younis Tirawi, @ytirawi, Tweet (11:27 pm, 13 July 2024), <https://x.com/ytirawi/status/1812237415324753935>.

fighters and comrades are still fighting with strength and courage for the People of Israel, to bring a big, decisive victory to the Jewish people by erasing the enemy, returning the hostages, complete demilitarization of Gaza, the absence of living conditions of the Amalekite side that will lead to their voluntary departure, God willing. In the future stage, with great hope for the change in the US government, to build fully Jewish settlements in Gaza.”¹⁹⁵

- On 17 November 2023, **Israeli soldiers from the 13th Battalion of the Golani Brigade**, stationed in Gaza, were filmed with Israeli popular singer Kobi Peretz, dancing with a Torah scroll and chanting: “May their village burn, May Gaza be erased”.¹⁹⁶
- On 13 December 2023, **Israeli private Sharon Ohana** posted on Facebook “‘Together we will demolish’ [wordplay on ‘together we will win’, a popular Israeli slogan since the beginning of the war] is not just a joke, but an unequivocal statement written in blood by the best military IDF officers and not for nothing. . .”.¹⁹⁷
- On 19 December 2023, **Israeli soldier from the 98th Division, Dror Baur**, posted a video of the destruction and burning of Jabalia refugee camp in Gaza to the tune of the popular Israeli song “May your village burn”.¹⁹⁸
- On 12 January 2024, **Israeli private Adam Sherman** stated: “And we really are flattening Gaza. I know a bit of history, in all of Israel’s wars, there has never been such destruction. Not Quneitra in ‘67, not the Dahiya quarter in 2006. Yes, yes. I’m not sorry to say it and I’m glad for it— they brought this on themselves. We are also helping them to start anew. A city of a million residents, like Jerusalem, empty of people. This is more than the Nakba we ‘did to them’ in ‘48. Yes, there are losses. And it hurts, but this is war. And yes, each one is a world unto himself, but that is the price we are unfortunately forced to pay to live safely in our neighbourhood. For every one of ours, 1000 of theirs go!!!”.¹⁹⁹
- On 23 January 2024, in a video uploaded to Facebook by **Israeli military soldier Oren Shmuel**, Israeli soldiers joked as Palestinian homes were detonated, chanting “so they’ll have nowhere to come back to”.²⁰⁰
- On 4 March 2024, an **Israeli soldier from the Givati Brigade** recorded himself in the ruins of a burned and bombed out home in Gaza, taunting Palestinians, stating: “Everything is broken, ruined, burnt, smashed, you have nowhere to come back to, Gazans. To all the dear Gazans, you’re not dear. You’re cheap. You’re homeless, homeless. We are going to make you miserable. We are going to show you who’s boss, who rules here. You’re going to suffer every second for what you did to us . . . You’re going to die. You have nowhere to come back to.”²⁰¹
- In March 2024, **soldiers about to enter Gaza**, in response to another soldier who asked them what their dream was, replied: “To conquer Gaza”, “to flatten Gaza”, “to shove them a pipe”, “to resettle Gush Katif”, to “open up a [tattoo] studio in Khan Younis”, “to avenge...”, “to erase Gaza”, and “It’s either us or them. There’s no proportionality. There’s no symmetry. Crush! Subdue!”.²⁰²

¹⁹⁵ Netanel Ne’man, Facebook (7 February 2024), <https://www.facebook.com/netaneln/posts/pfbid02E6tSaYkPYHnGAFCxYchn7MSCbwyQiCS3ewQ8AScnR4L7iiG1JhYCSaWQvh6z826Hl>, also available at Younis Tirawi, @ytirawi, Tweet (11:27 pm, 13 July 2024), <https://x.com/ytirawi/status/1812237415324753935>.

¹⁹⁶ “Peretz sings may your village burn 2”, OfekCenter (26 November 2023), <https://www.youtube.com/watch?v=xcH2o4c5KZY>.

¹⁹⁷ Sharon Ohana, Facebook (12 December 2023), <https://www.facebook.com/sharon.ohana.965/posts/pfbid0iEhxnWBEM1zM6UEpd12QnrwpU391nCDZbsBVj4EHwyyLzvHKGksTkxbDgKLSzN4Zl>, also available at Younis Tirawi, @ytirawi, Tweet (3:12 pm, 29 June 2024), <https://x.com/ytirawi/status/1807039538902024253>.

¹⁹⁸ Younis Tirawi, @ytirawi, Tweet (9:56 pm, 13 May 2024), <https://x.com/ytirawi/status/1790108960927719626>.

¹⁹⁹ Adam Sherman, Facebook (12 January 2024), <https://www.facebook.com/shermanhaon/posts/pfbid02BEPbjChSaRRjf9EXx92SZ3CGPQHxikxPfjxzDkyqijGdwC2Y7bMEXYpnLxzbjexl>.

²⁰⁰ Quds News Network, @QudsNen, Tweet (7:25 pm, 5 February 2024), <https://x.com/QudsNen/status/1754556787125104949>.

²⁰¹ Middle East Eye @middleeasteye, Tweet (12:53 am, 5 March 2024), <https://twitter.com/MiddleEastEye/status/1764786160830644361>.

²⁰² Younis Tirawi, @ytirawi, Tweet (6:49 pm, 25 March 2024), <https://twitter.com/ytirawi/status/1772304727457317039>.

- On 17 April 2024, the twitter account “**Reservists – The Generation of Victory**” posted a picture of eleven soldiers in uniform holding signs stating: “We soldiers of The Jewish People’s army from the right and the left will not take off our uniform until we erase and destroy Gaza”.²⁰³
- On 19 April 2024, a **soldier from the Givati Brigade, Ari Kaniel**, stated: “Regarding what’s happening in Gaza, [c]heer up. Gaza is being dismantled methodically and progressively, [k]illing anything that moves, and turning over every stone in an attempt to locate the hostages and the terrorists.”²⁰⁴
- In June 2024, a **soldier from the Givati brigade** commented “we’re here in Rafah, we won’t stop until we burn all of Gaza” while burning a home in Rafah.²⁰⁵
- On 21 June 2024, footage was posted of an **Israeli soldier** stating: “The IDF asked us to clear the area. Blow it all up. What can I do, I’m in [sic] obedient soldier. Tomorrow there won’t be anything here.”²⁰⁶
- On 28 September 2024, footage was posted online of an **Israeli soldier** bulldozing through Gaza and saying: “[Video] Friends, we’re destroying all their shops[.] Everything! Now you don’t have a road[.] There’s a boulevard of shops here . . . We will destroy everything you have. Nothing will be left La La La . . . [a]nd in a second, no houses, too.”²⁰⁷
- On 19 October 2023, **Israeli army medic Aviad Yisraeli** stated: “We are not the most moral army in the world. Not by a long shot . . . It’s time to take the moral high ground and carpet bomb Gaza until they beg us to stop . . . [it] is going to claim the lives of tens of thousands of Arabs in Gaza. Many of them non-combatants. And that that is the most moral thing we can do right now”.²⁰⁸ In further demonstration of that, in a subsequent post on 8 January 2024, he described the destruction by the Israeli army of the Palestinian village of Khirbat Akhzaya [Khirbet Khuza’a]. Posting on Facebook, he wrote: “. . . it was Khirbet Akhzaya’s turn to bear the consequences of their decision to attack the Jewish people . . . for the first time, I understood the value of those piles of concrete & iron that have become a symbol for this war. This village... should no longer exist. Destroyed buildings, burnt greenhouses, and even dead terrorists are not a strategic achievement. They are the most basic consequence that anyone who dared to lend a hand or even looked the other way regarding October 7th must bear. In the past two weeks, we conquered and destroyed Khirbet Akhzaya. We hung the Israeli flag and the Nir Oz flag on the municipality building, the school, and the mosque. Then we blew them up”.²⁰⁹ In May 2024, Aviad Yisraeli was deployed to Rafah.²¹⁰
- On 19 November 2023, **Officer Shlomi Warmstein** who served in Gaza wrote on Facebook: “In my wondrous journeys in recent days in Gaza, I was happy to

²⁰³ The reservists - the generation of victory, @ozleisraelaza, Tweet (11:14 am, 17 April 2024), <https://x.com/ozleisraelaza/status/1780525230064058757>.

²⁰⁴ Ari Kaniel, Facebook (19 April 2024), https://www.facebook.com/permalink.php?story_fbid=pfbid02RsT8YTUuguddFKM9XSZupqBPG5UoN88oN1P9iwCiCsKQtQ5MJeZTuueooumRZ8EQ1&id=100055031946747, also available at Younis Tirawi, @ytirawi, Tweet (8:51 pm, 23 July 2024), <https://x.com/ytirawi/status/1815821937274450316>.

²⁰⁵ Younis Tirawi, @ytirawi, Tweet (10:03 pm, 25 June 2024), <https://x.com/ytirawi/status/1805693205821981129>.

²⁰⁶ Younis Tirawi, @ytirawi, Tweet (10:17 pm, 21 June 2024), <https://x.com/ytirawi/status/1804247174693167120>.

²⁰⁷ Younis Tirawi, @ytirawi, Tweet (11:53 pm, 28 September 2024), <https://x.com/ytirawi/status/1840147909087535406>.

²⁰⁸ Aviad Yisraeli, Facebook (19 October 2023), <https://www.facebook.com/aviad.yisraeli/posts/pfbid0AYd5ZF553fvhC9GT3GvW2dSNBU4kjiwM7Bg4iMJwxM7AjqEjGwJKtnx2trfGvrl>. Available at Younis Tirawi, @ytirawi, Tweet (11:25 pm, 24 May 2024), <https://x.com/ytirawi/status/1794117454311952760/photo/1>.

²⁰⁹ Aviad Yisraeli, Facebook (8 January 2024), <https://www.facebook.com/aviad.yisraeli/posts/pfbid025CTvvSiy3VEhEnM9iTY3w9h3ps2JDukg3WSV8bJeH6DY75WXeewxxAtKZ7ZUWf7jl>, also available at Younis Tirawi, @ytirawi, Tweet (10:08 pm, 24 May 2024), <https://x.com/ytirawi/status/1794113236708573451>.

²¹⁰ Avid Yisraeli, Facebook (19 May 2024), <https://www.facebook.com/aviad.yisraeli/posts/pfbid02tuCCtqBNMf4t6e9mycPjAHQJSJYzXJkeyzQK1BizgDGtZkfJto2k5r1NaHnUEjjEUL>.

see the destruction inflicted by the IDF on the city of wickedness and evil. They simply destroyed everything there . . . ”.²¹¹

Destruction and Defilement of Palestinian Homes and Property

19. The above examples are illustrative of widespread and explicit calls by Israeli soldiers for the total destruction, wiping out and erasure of Gaza. Israeli soldiers openly film themselves bulldozing or detonating Palestinian homes and entire residential areas,²¹² often dedicating the destruction to their wives, fiancées, children and others.²¹³ Israeli soldiers in Gaza torch Palestinian houses and other buildings²¹⁴ —

²¹¹ Shlomi Warmstein, Facebook (19 November 2023), https://www.facebook.com/permalink.php?story_fbid=pfbid09LwpTUGf4ooiFf865jwSzVeZ1Pyx6CWcP7FkfatsCcoYzGGJ9XatWB9UUVLM4yTl&id=100012434852408.

²¹² Bellingcat, “We’ve Become Addicted to Explosions” The IDF Unit Responsible for Demolishing Homes Across Gaza (29 April 2024), <https://www.bellingcat.com/news/2024/04/29/weve-become-addicted-to-explosions-the-idf-unit-responsible-for-demolishing-homes-across-gaza/>; Clash Report, @clashreport, Tweet (8:37 pm, 4 January 2024), <https://x.com/clashreport/status/1742978571700953436>; Younis Tirawi, @ytirawi, Tweet (1:56 am, 5 April 2024), <https://x.com/ytirawi/status/1776036052102255033>; Quds New Network, @QudsNen, Tweet (4:36 pm, 16 May 2024), <https://x.com/qudsnen/status/179111540312655029>; Younis Tirawi, @ytirawi, Tweet (11:48 pm, 16 May 2024), <https://x.com/ytirawi/status/1791224298117468183>; Younis Tirawi, @ytirawi, Tweet (6:10 pm, 7 March 2024), <https://x.com/ytirawi/status/1765772025639874750>; Younis Tirawi, @ytirawi, Tweet (10:40 am, 26 May 2024), <https://x.com/ytirawi/status/1794649900590006524>; Kann News, @kann_news, Tweet (5:58 pm, 14 June 2024), https://x.com/kann_news/status/1801645491110679008; Younis Tirawi, @ytirawi, Tweet (12:28 am, 15 June 2024), <https://x.com/ytirawi/status/1801743650373964021>; Younis Tirawi, @ytirawi, Tweet (12:43 am, 15 June 2024), <https://x.com/ytirawi/status/1801747288328479222>; Younis Tirawi, @ytirawi, Tweet (9:16 pm, 2 June 2024), <https://x.com/ytirawi/status/1797346692494237904>; Younis Tirawi, @ytirawi, Tweet (12:37 am, 22 June 2024), <https://x.com/ytirawi/status/1804282550040281330>; Younis Tirawi, @ytirawi, Tweet (9:27 pm, 29 June 2024), <https://x.com/ytirawi/status/1807133841322082481>; Younis Tirawi, @ytirawi, Tweet (2:54 pm, 29 June 2024), <https://x.com/ytirawi/status/1807034930817290722>; Younis Tirawi, @ytirawi, Tweet (12:21 pm, 27 June 2024), <https://x.com/ytirawi/status/1806271682815869389>; Younis Tirawi, @ytirawi, Tweet (10:42 pm, 1 June 2024), <https://x.com/ytirawi/status/1797005819600322896>; Younis Tirawi, @ytirawi, Tweet (11:39 am, 25 September 2024), <https://x.com/ytirawi/status/1838876061448200376>; “Investigating war crimes in Gaza I Al Jazeera Investigations”, *Al Jazeera English* (3 October 2024), <https://www.youtube.com/watch?v=kPE6vbKix6A>, [7:18-7:28, 24:07-24:32] and [33:19-34:20]: “so they will have nowhere to come back to”; Younis Tirawi, @ytirawi, Tweet (1:43 pm, 31 October 2024), <https://x.com/ytirawi/status/1851953115081089073>; Hallel Bitton Rosen, @BittonRosen, Tweet (10:43 am, 23 October 2024), <https://x.com/BittonRosen/status/1849008804567920727>; YINONEWS [Yinon Magal News], @yinonews, Telegram (11 November 2024), <https://t.me/yinonews/28020>; Younis Tirawi, @ytirawi, Tweet (12:29 pm, 27 December 2024), <https://x.com/ytirawi/status/1872605614125572303>. See also Lt. Col. Yair Maen, Facebook, <https://www.facebook.com/reel/2690548081113464>; Lt. Col. Yair Maen, Facebook, <https://www.facebook.com/reel/1395562144678873>; Lt. Col. Yair Maen, Facebook, <https://www.facebook.com/reel/314458238239922>.

²¹³ Quds News Network, @QudsNen, Tweet (7:32 pm, 9 January 2024), <https://x.com/QudsNen/status/1744774086746624289>; @torahidf, Telegram (18 February 2024), <https://t.me/torahidf/17646>: “Ben Chai Ran dedicates an explosion of terrorist infrastructure to his brother Or Yosef Ran, the late (son of Avri Ran from Givaot Olam) who fell on October 7 in the battle to liberate Kfar Gaza”; “WATCH: Israeli soldier dedicates Gaza explosion to daughter on second birthday”, *Democracy for the Arab World (DAWN)* (26 November 2023), <https://www.dawn.com/news/1792788>; “Israeli soldiers in Gaza made ‘Save The Date’ video by blowing up a house”, *Middle East Eye* (29 December 2023), https://www.youtube.com/watch?v=3_SgxLIGrA.

²¹⁴ See, e.g., Younis Tirawi, @ytirawi, Tweet (9:10 pm, 26 May 2024), <https://x.com/ytirawi/status/1794808353690202424>; Younis Tirawi, @ytirawi, Tweet (4:29 pm, 24 May 2024), <https://x.com/ytirawi/status/1794012735228825939>; Younis Tirawi, @ytirawi, Tweet (2:29 pm, 23 May 2024), <https://x.com/ytirawi/status/1793620168155042234>; Younis Tirawi, @ytirawi, Tweet (2:59 am, 22 April 2024), <https://twitter.com/ytirawi/status/1782212698953990238>; Younis Tirawi, @ytirawi, Tweet (3:04 am, 22 April 2024), <https://twitter.com/ytirawi/status/1782213744531054747>; Younis Tirawi, @ytirawi, Tweet (1:47 am, 5 April 2024), <https://twitter.com/ytirawi/status/1776033844820336973>; Younis Tirawi, @ytirawi, Tweet (1:59 pm, 7 May 2024), <https://x.com/ytirawi/status/1787814577033375768>; Younis Tirawi, @ytirawi, Tweet (12:25 pm, 31 May 2024), <https://x.com/ytirawi/status/1796488119967166693>; Younis Tirawi, @ytirawi, Tweet (2:46 pm, 2 June 2024), <https://x.com/ytirawi/status/1797248439345918342>; Younis Tirawi, @ytirawi, Tweet (9:38 pm, 6 June 2024), <https://x.com/ytirawi/status/1798801765845897336>; Younis Tirawi, @ytirawi, Tweet (9:03 pm, 9 June 2024), <https://x.com/ytirawi/status/179988009667077355>; Younis Tirawi, @ytirawi, Tweet (3:43 pm, 15 June 2024), <https://x.com/ytirawi/status/1801973888529678428>; Younis Tirawi, @ytirawi, Tweet (2:15 pm, 20 June 2024), <https://x.com/ytirawi/status/1803763522507042905>; Younis Tirawi, @ytirawi, Tweet (10:03 pm, 27 June 2024), <https://x.com/ytirawi/status/1806418074112761996>; Younis Tirawi, @ytirawi, Tweet (3:24 pm, 27 June 2024), <https://x.com/ytirawi/status/1806317804150300687>; Younis Tirawi, @ytirawi, Tweet (11:43 pm, 29 June 2024), <https://x.com/ytirawi/status/1807168046353567973>; Younis Tirawi, @ytirawi, Tweet (12:25 am, 30 June 2024), <https://x.com/ytirawi/status/1807178695309979705>; Younis Tirawi, @ytirawi, Tweet (4:26 pm, 30 June 2024), <https://x.com/ytirawi/status/1807420409232474420>; Younis Tirawi, @ytirawi, Tweet (8:36 pm, 30 October 2024), <https://x.com/ytirawi/status/1851694605810438551>; Younis Tirawi, @ytirawi, Tweet (8:39 pm, 30 October 2024), <https://x.com/ytirawi/status/1851695427382300770>; Younis Tirawi, @ytirawi, Tweet (1:03 am, 1 November 2024), <https://x.com/ytirawi/status/1852124257121169594>; B.M., @ireallyhateyou, Tweet (9:50 pm, 1 November 2024), <https://x.com/ireallyhateyou/status/1852438020605235301>; Younis Tirawi, @ytirawi, Tweet (7:39 pm, 2 November 2024), <https://x.com/ytirawi/status/1852767606677086261>; Younis Tirawi, @ytirawi, Tweet (1:45 pm, 7 November 2024), <https://x.com/ytirawi/status/1854490421390401700>.

including to the tune of the popular Israeli chant “may your village burn”,²¹⁵ spray-painting this slogan on shot-up Palestinian homes,²¹⁶ asserting their pride in burning down “as many [Palestinian homes] as possible”,²¹⁷ as a “hobby”.²¹⁸ Soldiers also post Instagram stories indicating their intent to destroy Palestinian homes and neighbourhoods, commenting “tak[ing] a weekend break, and [then] we[’ll] come back to tear down your houses”.²¹⁹ They engage in such destruction openly, calling for the “deaths to the Arabs”,²²⁰ declaring “may you burn alive”,²²¹ that “Gaza is burning”,²²² “we’ll burn your mother”²²³ and that “[a]ll of Shujaia will burn in flames”.²²⁴

20. Such destruction of entire residential buildings and areas occurs alongside the wanton defacement of houses and buildings with graffiti (“extermination zone”, “death to Arabs”, “A good Arab man is a dead Arab man”);²²⁵ and destruction of moveable Palestinian property. Israeli soldiers routinely film themselves smashing up Palestinian homes, interiors and personal belongings,²²⁶ including mirrors and

²¹⁵ Arik M, @arikmaslawi, Tiktok (30 January 2024), <https://www.tiktok.com/@arikmaslawi/video/7329947645584166151> (original since removed), also available at Younis Tirawi, @ytirawi, Tweet (9:12 pm, 31 January 2024), <https://twitter.com/ytirawi/status/1752771808531517628>. See also Younis Tirawi, @ytirawi, Tweet (10:40 pm, 19 February 2024), <https://twitter.com/ytirawi/status/1759679360842313849>; Younis Tirawi, @ytirawi, Tweet (8:50 pm, 28 December 2024), <https://x.com/ytirawi/status/1873094309991596285>.

²¹⁶ Younis Tirawi, @ytirawi, Tweet (10:40 pm, 19 February 2024), <https://twitter.com/ytirawi/status/1759679360842313849>.

²¹⁷ Yehuda Vald, @yehodavald, Tweet (11:48 am, 1 February 2024), <https://twitter.com/yehodavald/status/1752992379156533533>.

²¹⁸ See e.g., Sharon Orshalimi, “M returned from Gaza to tell”, *Politically Correct* (3 March 2024), <https://politicallycorret.co.il/mmm/>: “And within this unrestrained violence, which is only driven by revenge, the brigade commander was in first place. His nickname is the ‘Tiktok Brigade Commander’. He endangered us at every moment in this war, without any operational need. And his lieutenant, his hobby inside Gaza was to enter houses and burn them. For no reason. And on the way he burned a lot of intelligence material. And he had no way of knowing whether or not there were hostages in some shaft underneath or in the attic. He went in house by house and set it on fire”; Younis Tirawi, @ytirawi, Tweet (6:01 pm, 12 April 2024), <https://twitter.com/ytirawi/status/1778815780609462559>: “I am done with the whole thing already, so we burn down another building, loot another property.”; Quds News Network, @QudsNen, Tweet (8:48 pm, 29 March 2024), <https://twitter.com/QudsNen/status/1773784221439467600>; The Commission of Inquiry remarked on the extensive torching by Israeli soldiers of homes in Gaza, 711F and concluded that the Israeli army “destroyed and cleared entire zones and burned houses for no clear military necessity.”, see UN HRC, *Detailed findings on the military operations and attacks carried out in the Occupied Palestinian Territory from 7 October to 31 December 2023*, A/HRC/56/CRP.4 (10 June 2024), <https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session56/a-hrc-56-crp-4.pdf>, pp. 18–19, paras. 69–72.

²¹⁹ Younis Tirawi, @ytirawi, Tweet (11:25 pm, 17 September 2024), <https://x.com/ytirawi/status/1836154590594764877>.

²²⁰ Younis Tirawi, @ytirawi, Tweet (11:27 pm, 14 March 2024), <https://twitter.com/ytirawi/status/1768388440876306830>.

²²¹ Younis Tirawi, @ytirawi, Tweet (1:30 am, 2 March 2024), <https://twitter.com/ytirawi/status/1763708375626359153>.

²²² *Ibid.*

²²³ Younis Tirawi, @ytirawi, Tweet (2:31 pm, 27 March 2024), <https://twitter.com/ytirawi/status/1772964772629111095>.

²²⁴ *Ibid.*

²²⁵ Hebrew Graffiti left by the Israeli military inside a house of a Palestinian in Gaza that reads “Extermination zone” at Younis Tirawi, @ytirawi, Tweet (9:57 pm, 6 June 2024), <https://x.com/ytirawi/status/1798806498480365719>; “A good Arab man is a dead Arab man.” at B.M., @ireallyhateyou, Tweet (2:27 pm, 10 October 2024), <https://x.com/ireallyhateyou/status/1844354039938679306>; Hebrew graffiti on the walls inside and outside of the Turkish-Palestinian Friendship Hospital, reading “death to Arabs” and “Kahane was right [reference to Meir Kahane, an ultra-nationalist Jewish leader]” at Younis Tirawi, @ytirawi, Tweet (10:48 pm, 30 June 2024), <https://x.com/ytirawi/status/1807516578721804474>. See also B.M., @ireallyhateyou, Tweet (10:21 am, 22 June 2024), <https://x.com/ireallyhateyou/status/1804429433622626581>; UNGA, *Report of the Independent International Commission of Inquiry on the Occupied Palestinians Territory, including East Jerusalem, and Israel*, A/79/232 (11 September 2024), <https://undocs.org/A/79/232>, p. 7, paras. 23–24; UN HRC, *Detailed findings on the military operations and attacks carried out in the Occupied Palestinian Territory from 7 October to 31 December 2023*, A/HRC/56/CRP.4 (10 June 2024), <https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session56/a-hrc-56-crp-4.pdf>, p. 96, para. 377, recording that Israeli soldiers left the following slogans on the walls of a women’s rights centre in Gaza City: “You sons of bitches, we came here to fuck you, you and your mothers, you bitches” and “The dirty pussies of your prostitutes, you ugly Arab you ugly, you sons of bitches, we will burn you alive you dogs”.

²²⁶ UN HRC, *Detailed findings on the military operations and attacks carried out in the Occupied Palestinian Territory from 7 October to 31 December 2023*, A/HRC/56/CRP.4 (10 June 2024), <https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session56/a-hrc-56-crp-4.pdf>, p. 19, para. 73; Younis Tirawi, @ytirawi, Tweet (10:01 pm, 4 May 2024), <https://x.com/ytirawi/status/1786848576674443715>; Quds News Network, @QudsNen, Tweet (12:35 pm, 5 March 2024), <https://twitter.com/QudsNen/status/1764781738436293036>; Younis Tirawi, @ytirawi, Tweet (12:28 am, 15 June 2024), <https://x.com/ytirawi/status/1801743650373964021>; Younis Tirawi, @ytirawi, Tweet (12:43 am, 15 June 2024), <https://x.com/ytirawi/status/1801747288328479222>; “Investigating war crimes in Gaza I Al Jazeera Investigations”, *Al Jazeera English* (3 October 2024), <https://www.youtube.com/watch?v=kPE6vbKix6A>, [24:33–26:05]; Younis Tirawi, @ytirawi, Tweet (9:26 pm, 8 October 2024), <https://x.com/ytirawi/status/1843734840837058741>.

crookery,²²⁷ and the deliberate crushing of cars belonging to Palestinians.²²⁸ Israeli soldiers also engage in widespread looting of Palestinian property and more, openly recording themselves stealing money from Palestinian homes, ‘joking’ “are you looting again? ... what did you loot today?”.²²⁹

21. Israeli soldiers repeatedly post disturbing photographs and videos of themselves posing with or dressing up in the clothes — including the underwear — of displaced or dead Palestinian women,²³⁰ or searching through their underwear drawers.²³¹ They post photographs and videos of themselves ‘playing’ with the toys of displaced or dead Palestinian children,²³² and using disability aids belonging to displaced or dead Palestinians, taken from Palestinian homes or hospitals.²³³ They also post photographs of Palestinian children’s toys affixed to the front of their tanks.²³⁴

²²⁷ Younis Tirawi, @ytirawi, Tweet (2:50 pm, 7 April 2024), <https://twitter.com/ytirawi/status/1776955769553867178>; Younis Tirawi, @ytirawi, Tweet (5:51 pm, 9 March 2024), <https://twitter.com/ytirawi/status/1766492132829716751>; Younis Tirawi, @ytirawi, Tweet (11:59 am, 18 May 2024), <https://x.com/ytirawi/status/1791770589985640847>; Younis Tirawi, @ytirawi, Tweet (3:23 pm, 27 March 2024), <https://twitter.com/ytirawi/status/1772977789186056632>.

²²⁸ Younis Tirawi, @ytirawi, Tweet (6:04 pm, 11 May 2024), <https://x.com/ytirawi/status/1789325679525249441>; Younis Tirawi, @ytirawi, Tweet (1:50 am, 19 January 2024), <https://x.com/ytirawi/status/1748130778737729911>. See also Younis Tirawi, @ytirawi, Tweet (6:34 pm, 8 October 2024), <https://x.com/ytirawi/status/1843691535180943493>.

²²⁹ Younis Tirawi, @ytirawi, Tweet (10:00 pm, 26 February 2024), <https://twitter.com/ytirawi/status/1762221066372485260>; UN HRC, *Detailed findings on the military operations and attacks carried out in the Occupied Palestinian Territory from 7 October to 31 December 2023*, A/HRC/56/CRP.4 (10 June 2024), <https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session56/a-hrc-56-crp-4.pdf>, p. 19, para. 73.

²³⁰ Younis Tirawi, @ytirawi, Tweet (7:41 pm, 21 February 2024), <https://twitter.com/ytirawi/status/1760359033095991623>; Younis Tirawi, @ytirawi, Tweet (7:31 pm, 12 February 2024), <https://twitter.com/ytirawi/status/1757094979460067773>; Younis Tirawi, @ytirawi, Tweet (3:40 pm, 4 March 2024), <https://x.com/ytirawi/status/1764647157208891649>; Younis Tirawi, @ytirawi, Tweet (8:02 pm, 16 May 2024), <https://x.com/ytirawi/status/1791167455731048886>; Younis Tirawi, @ytirawi, Tweet (12:24 pm, 18 May 2024), <https://x.com/ytirawi/status/1791776873485115641>; Younis Tirawi, @ytirawi, Tweet (1:05 pm, 25 March 2024), <https://twitter.com/ytirawi/status/1772399473018192372>; Younis Tirawi, @ytirawi, Tweet (12:13 pm, 27 March 2024), <https://twitter.com/ytirawi/status/1772748840388419826>; Younis Tirawi, @ytirawi, Tweet (5:52 pm, 9 March 2024), <https://twitter.com/ytirawi/status/1766492204267081876>; Younis Tirawi, @ytirawi, Tweet (11:04 pm, 6 April 2024), <https://twitter.com/ytirawi/status/1776717745045803169>; Younis Tirawi, @ytirawi, Tweet (1:29 pm, 1 March 2024), <https://twitter.com/ytirawi/status/1763708246227865971>; Younis Tirawi, @ytirawi, Tweet (10:21 am, 8 March 2024), <https://twitter.com/ytirawi/status/1766016416371630284>; Middle East Eye, @MiddleEastEye, Tweet (5:46 pm, 17 April 2024), <https://twitter.com/MiddleEastEye/status/1780623930400948367>; Younis Tirawi, @ytirawi, Tweet (3:17 am, 22 April 2024), <https://twitter.com/ytirawi/status/1782217080986579148>; Younis Tirawi, @ytirawi, Tweet (2:29 pm, 27 March 2024), <https://twitter.com/ytirawi/status/1772964108121313599>; Estelle Shirbon & Pola Grzanka, “Israeli soldiers play with Gaza women’s underwear in online posts”, *Reuters* (28 March 2024), <https://www.reuters.com/world/middle-east/israeli-soldiers-play-with-gaza-womens-underwear-online-posts-2024-03-28/>; B.M., @ireallyhateyou, Tweet (12:37 am, 23 February 2024), <https://twitter.com/ireallyhateyou/status/1760977168426029162>; “British-born Israeli soldier rummages through lingerie drawers in Gaza homes”, *Middle East Eye* (5 January 2024), <https://www.youtube.com/shorts/EgQd1k4FhdK>; Younis Tirawi, @ytirawi, Tweet (11:25 pm, 5 July 2024), <https://x.com/ytirawi/status/1809337728439390345>; Younis Tirawi, @ytirawi, Tweet (4:00 pm, 15 June 2024), <https://x.com/ytirawi/status/1801978091654279226>; Younis Tirawi, @ytirawi, Tweet (6:31 pm, 28 June 2024), <https://x.com/ytirawi/status/1806727118341963863>; B.M., @ireallyhateyou, Tweet (11:17 pm, 13 October 2024), <https://x.com/ireallyhateyou/status/1845574604871356925>; Younis Tirawi, @ytirawi, Tweet (4:18 pm, 3 November 2024), <https://x.com/ytirawi/status/1853079280529420393>.

²³¹ “British-born Israeli soldier rummages through lingerie drawers in Gaza homes”, *Middle East Eye* (5 January 2024), <https://www.youtube.com/shorts/EgQd1k4FhdK>.

²³² Younis Tirawi, @ytirawi, Tweet (7:42 pm, 23 February 2024), <https://twitter.com/ytirawi/status/1761084227846648004>; Younis Tirawi, @ytirawi, Tweet (10:35 pm, 20 February 2024), <https://twitter.com/ytirawi/status/1760040514915553463>; B.M., @ireallyhateyou, Tweet (9:11 pm, 27 February 2024), <https://x.com/ireallyhateyou/status/1762556002711289987>; Younis Tirawi, @ytirawi, Tweet (12:13 pm, 18 May 2024), <https://x.com/ytirawi/status/1791774091847798931>; Younis Tirawi, @ytirawi, Tweet (9:43 pm, 10 March 2024), <https://twitter.com/ytirawi/status/1766912783935852922>; Younis Tirawi, @ytirawi, Tweet (3:15 am, 22 April 2024), <https://twitter.com/ytirawi/status/1782216567431872723>.

²³³ “Israeli soldiers filmed abusing hospital’s assistive devices”, *Middle East Monitor* (3 February 2024), <https://www.middleeastmonitor.com/20240203-israeli-soldiers-filmed-abusing-hospitals-assistive-devices/>; Jalal, @JalalAK_jojo, Tweet (12:28 am, 22 February 2024), https://twitter.com/JalalAK_jojo/status/1760431314312790255.

²³⁴ Quds News Network, @QudsNen, Tweet (8:07 pm, 25 February 2024), <https://twitter.com/QudsNen/status/1761815084081246331>; Quds News Network, @QudsNen, Tweet (12:07 pm, 29 October 2024), <https://x.com/QudsNen/status/1851022904592388346>.

22. Soldiers post photographs and videos of themselves posing as estate agents, selling Palestinian homes to Israelis.²³⁵ They also film and photograph themselves in Palestinian homes, staging mock domestic scenes,²³⁶ with Israeli newspapers themselves carrying ‘lifestyle pieces’ on Israeli soldiers taking over Palestinian homes and kitchens, cooking themselves meals using ingredients belonging to displaced, starving Palestinians.²³⁷ A document published by the military rabbinate on 7 January 2024 having provided soldiers in Gaza with detailed instructions on how they could use food found in homes in Gaza while keeping kosher.²³⁸ The document ended with the Biblical directive: “you shall consume [destroy] all the peoples” (from Deuteronomy: “You shall consume [destroy] all the peoples that your God delivers to you, showing them no pity”).²³⁹

Amalek and other Biblical Edicts

23. Calls for the destruction of Gaza are also often made with reference to Biblical edicts, with cities in Gaza being referred to as ‘Amalekite’²⁴⁰ and with Gaza’s destruction being regularly compared to the Biblical destruction of ‘Sodom and Gomorrah’:²⁴¹

- On 8 October 2023, **Major Dan Goldberger, of the Netzah Yisrael Combat Reserve Battalion 941**, posted on Facebook: “We will not forgive what Gaza has done to us. This is a war of to be or not to be. A war of good against evil. Am Israel Chai [The Jewish people live] and [are] strong. The objective should be erasing the city of Gaza, city of terror, murder, and evil, off of the face of the earth. ‘Just like the upheaval of Sodom and Gomorrah’ [Deuteronomy 29:22][.] And the time is now.”²⁴²
- On 9 October 2023, **Major Avinoam Goelman, Commander in the 98th Division of the Israeli military** urged that “. . . Gaza City and all of its houses must be erased from existence. A city of sinners [literally: a city of Sodom, referring to the Biblical story of Sodom and Gomorrah, see Genesis 19:1-29] that has no right to exist”.²⁴³

²³⁵ Younis Tirawi, @ytirawi, Tweet (2:02 pm, 24 February 2024), <https://twitter.com/ytirawi/status/1761360983174316281>. See also “Israeli soldier gives tour of occupied Palestinian home in Gaza”, *Middle East Eye* (16 February 2024), <https://www.middleeastmonitor.com/20240216-israeli-soldier-gives-tour-of-occupied-palestinian-home-in-gaza/>.

²³⁶ Younis Tirawi, @ytirawi, Tweet (3:40 pm, 27 March 2024), <https://twitter.com/ytirawi/status/1772982136796041377>.

²³⁷ “In every house in Gaza we found olives, olive oil and full of spices. We cook there with mixed feelings”, *Haaretz* (13 February 2024), <https://www.haaretz.co.il/food/2024-02-13/ty-article-magazine/.premium/0000018d-82c5-d6dc-ab9f-cffd1ebc0000>.

²³⁸ Arie Yoeli, “We found non-kosher food in a house in Gaza, is it allowed to be eaten?”, *Srugim* (7 January 2024), <https://www.srugim.co.il/883163-מותר-האם-בבית-כשרות-בל-אויכל-בלי-כשרות-בבית-מותר-האם-מותר>.

²³⁹ Sefaria, Deuteronomy 7:16, JPS, 1985, https://www.sefaria.org/Deuteronomy.7.16?lang=bi&vside=Tanakh:_The_Holy_Scriptures,_published_by_JPS|en&with=Translation%20Open&lang2=en.

²⁴⁰ See Sefaria, Deuteronomy 25:17-19, JPS, 1985, https://www.sefaria.org/Deuteronomy.25.17?ven=Tanakh:_The_Holy_Scriptures,_published_by_JPS&lang=bi&aliyot=0: “Remember what Amalek did to you on your journey, after you left Egypt — how, undeterred by fear of God, he surprised you on the march, when you were famished and weary, and cut down all the stragglers in your rear. Therefore, when the LORD your God grants you safety from all your enemies around you, in the land that the LORD your God is giving you as a hereditary portion, you shall blot out the memory of Amalek from under heaven. Do not forget!”.

See also 1 Samuel 15:3, JPS, 1985, https://www.sefaria.org/I_Samuel.15?lang=bi: “Now go, attack Amalek, and proscribe all that belongs to him. Spare no one, but kill alike men and women, infants and sucklings, oxen and sheep, camels and asses!”

²⁴¹ See Sefaria, Deuteronomy 29:19-22, JPS 1985, <https://www.sefaria.org/Deuteronomy.29.20?lang=en&aliyot=0>: “The LORD will never forgive him; rather will the LORD’s anger and passion rage against that man, till every sanction recorded in this book comes down upon him, and the LORD blots out his name from under heaven . . . And later generations will ask—the children who succeed you, and foreigners who come from distant lands and see the plagues and diseases that the LORD has inflicted upon that land, all its soil devastated by sulfur and salt, beyond sowing and producing, no grass growing in it, just like the upheaval of Sodom and Gomorrah, Admah and Zeboiim, which the LORD overthrew in His fierce anger— . . .”

²⁴² Maj. Dan Goldberger, Facebook (8 October 2024), https://www.facebook.com/permalink.php?story_fbid=pfbid02U3dp6r4pGRBzKcxua4UUZJMRMWQysgrvFpVXXLE14aEtjAf3aXY8aTnAXGg9pYK31&id=100020588880209, also available Younis Tirawi, @ytirawi, Tweet (8:56 pm, 1 June 2024) <https://x.com/ytirawi/status/1796979176991256943>.

²⁴³ Maj. Avinoam Goelman, Facebook (9 October 2023), <https://www.facebook.com/agoelman/posts/pfbid0357Dq5Vbd3xAtMMiRW7vZmNkAMt3fEmw9LxpxwYzLuPVzrVmZZmdyC2cqXg9QvJ7ql>, also available at Younis Tirawi, @ytirawi, Tweet (10:37 pm, 26 May 2024), <https://x.com/ytirawi/status/1794830323286438314>.

- On 1 March 2024, **Major Asaf Fried**, posted a time-lapse picture of the destruction of Khan Younis, captioned with these words: “Amazing! So should be done to all cities of the Amalekites (Khan Younis, in the midst of the IDF operation).”²⁴⁴
- On 24 October 2023, **Captain of the 55th Brigade, Yachiam Sharlo**, posted on Facebook: “‘Now the inhabitants of Sodom were very wicked sinners against the LORD’ [Genesis 13, 13] . . . So we read today in the daily portion of the Parashah [a rotating section from the Old Testament read each week] and from today we can add the city of Gaza to the expression Sodom and Gomorrah . . . Gaza, Sodom and Gomorrah. Because what happened there that justified the city’s destruction doesn’t even come close to the evil [of] body dismemberment, abduction, wickedness, theft, rape, to what happened two and a half weeks ago. In Gaza, there’s no discussion of whether there are any righteous people [present] in the city . . . So this city must be destroyed today as well. With fire and brimstone.”²⁴⁵
- On 13 November 2024, and during Israel’s intensification of its genocidal conduct in northern Gaza, a video was published of **soldiers of the Givati Brigade’s Rotem Battalion** preparing to enter Jabalia, singing revenge songs which proclaim “And I will take the revenge of one of my two eyes of the Philistines [Inspired by Judges 16, 28] May their name be erased!”²⁴⁶

Calls for the Extermination and Killing of Palestinians in Gaza

24. Senior officers and soldiers in the Israeli army have also continuously and publicly called for the extermination and killing of Palestinians in Gaza:

- On 13 October 2023, **Colonel Gur Rosenblat** posted on Facebook: “It’s important for me to emphasize that everything written here is my personal opinion only, with no connection to my role as a division commander in the IDF or as the deputy CEO of the Ministry of Education . . . What has to happen is for the Gaza Strip to cease existing. Not the Hamas organization, but the Gaza strip. According to the most overblown estimates, there are 2 million people in the Strip, most of them Hamas supporters who also voted for [Hamas] the one time they had elections. We will allow whoever wants to get out of the Strip to do so. To Europe, to Egypt, it doesn’t matter where. As for those who stay — some of the people will be hurt by the artillery we fire on the Strip. Bombings which will finally be completely random. Not aimed at all kinds of vague Hamas-related goals like what’s happening today. The rest of the population will leave after that. No one will remain in the Strip. Then, the cities in the Strip will be flattened, and in their place Israeli cities will be built, . . . This is also the most ethical result. People who are human animals and their supporters have to pay a heavy price. If not with their lives then through deportation. . . .”²⁴⁷
- On 11 October 2023, **Lieutenant Colonel David Levi**, posted: “I don’t accept the statement that ‘Gaza will not return to what it was.’ Action must be taken so

²⁴⁴ Maj. Asaf Fred, Facebook (1 March 2024), https://www.facebook.com/permalink.php?story_fbid=pfbid0AQQtGUZ9oCGd9wBm35r7SbQcxm47mnckvJJrGY1PB5aKsru94aCZbpXu18C3q1mBNl&id=100000183658777, also available at Younis Tirawi, @ytirawi, Tweet (10:51 pm, 9 June 2024), <https://x.com/ytirawi/status/1799907308408811836>.

²⁴⁵ Yachiam Sharlo, Facebook (24 October 2024), <https://www.facebook.com/yehi.ivri/posts/pfbid02fJAbo2FK7QAqfv7zUxtnH5GiokL6NkBSnT4zR3XzD4Cinw1zqJCd4xyLaED8XiFC1>, also available at Younis Tirawi, @ytirawi, Tweet (12:43 pm, 15 June 2024), <https://x.com/ytirawi/status/1801928434681069908>.

²⁴⁶ YINONEWS [Yinon Magal News], @yinonews, Telegram (13 November 2024), <https://t.me/yinonews/28149>; Nimer Sultany, @NimerSultany, Tweet (10:10 am, 14 November 2024), <https://x.com/NimerSultany/status/1856988017799446607>.

²⁴⁷ Col. Gur Rosenblat, Facebook (12 October 2023), https://www.facebook.com/permalink.php?story_fbid=pfbid02DSbuwRd1WV6yZCciX9ySXRzEzuLiUwHH8gH4vGGHAvGV4yLJyUs979Bugs4k5MBVh1&id=100032765238108, also available at Younis Tirawi, @ytirawi, Tweet (8:17 pm, 13 June 2024), <https://x.com/ytirawi/status/1801317881306653117>.

that Gaza no longer exists!! No buildings, no people.”²⁴⁸ On 16 October 2023, he posted, “Extermination!!! Not containment, not points of balance, not humanitarian, [n]o proportions... Only extermination!!!”.²⁴⁹ On 4 November 2023, he posted, “There are no innocent people in Gaza! They have one option... annihilation!”.²⁵⁰

- On 26 October 2023, **Lieutenant Colonel Shmuel Yagodaev** posted: “There’s no need to rebuild the barrier around the Gaza envelope; it’s a waste of money. We need to end the war in such a way that the remaining survivors in Gaza will fence and protect themselves out of fear.”²⁵¹ On 16 May 2024 he advocated that “[t]he day after’ in the Gaza Strip needs to look like those who were there ‘the day before’ simply won’t be!”.²⁵²
- On 15 December 2023, **Lieutenant Colonel Eyal Shalit Snir**, who, as indicated above, served in Gaza²⁵³ and states that he “command[s] the aid convoys that enter Gaza daily”²⁵⁴ ‘tweeted’, “[n]o death of an Israeli hostage will stop us from destroying and wiping out all the Gazan dogs and anyone who helped them in Gaza. Gaza and all of Hamas and all of the citizens who helped Hamas will be wiped off the earth and new Jewish settlements will be built on the liberated land. You Palestinian dogs will be burned everywhere in Gaza, Ramallah, Jenin, Hebron until you are destroyed. That’s a promise!”.²⁵⁵ He further stated on 30 January 2024 that “Everyone there took part in terrorism . . . Everybody. From infancy. Everyone in Gaza has to pay for everything: death, surrender or transfer!”.²⁵⁶
- On 29 December 2023, **Lieutenant Colonel Shauli Sanker**, posted, *inter alia*: “. . . It is impossible to win a war against a cruel nation like the Palestinians with humanity. They are all, from the oldest to the youngest [lit. from the biggest to the smallest], a criminal nation of rapists, child murderers, and kidnappers of the elderly and of children. Their fate is one — death. Whoever does not understand this after the events of Black Saturday [Oct 7th] and continues to talk about peace and two states will face, as I have already written, the murderers and massacre in the heart of the Sharon Plain [central section of the Israeli coastal area], in Kfar Saba [Jewish-Israeli town close to the West Bank], and Tel Aviv, no less.”²⁵⁷

²⁴⁸ Younis Tirawi, @ytirawi, Tweet (7:28 am, 19 June 2024), <https://x.com/ytirawi/status/1803298835533340696>.

²⁴⁹ Younis Tirawi, @ytirawi, Tweet (7:32 am, 19 June 2024), <https://x.com/ytirawi/status/1803299870909825289>.

²⁵⁰ Younis Tirawi, @ytirawi, Tweet (7:44 am, 19 June 2024), <https://x.com/ytirawi/status/1803302800161448263>.

²⁵¹ Lt. Col. Shmuel Yagodaev, Facebook (26 October 2024), https://www.facebook.com/permalink.php?story_fbid=pfbid037JjVCp3WiGM7QRSvJAZvzCeVy5HpqMJnH8WtB3DFMSsAUVJ4gY3HtDqTdR8wqxTYl&id=100030738703697, also available at Younis Tirawi, @ytirawi, Tweet (10:51 am, 7 June 2024), <https://x.com/ytirawi/status/1799001288493105388>.

²⁵² Lt. Col. Shmuel Yagodaev, Facebook (16 May 2024), https://www.facebook.com/permalink.php?story_fbid=pfbid02r45oks3ktS422NKQPze2Lgp7YKnNzdoEJa3SBmZkcENFqYTtKf3ddkeqhYHw82EMl&id=100030738703697, also available at Younis Tirawi, @ytirawi, Tweet (10:47 am, 7 June 2024), <https://x.com/ytirawi/status/1799000240315613533>.

²⁵³ Younis Tirawi, @ytirawi, Tweet (11:53 pm, 13 September 2024), <https://x.com/ytirawi/status/1834712034815987864/photo/1>.

²⁵⁴ Younis Tirawi, @ytirawi, Tweet (11:22 pm, 13 September 2024), <https://x.com/ytirawi/status/1834704137298100719>; Original at Eyal Shalit Snir, @ShalitEyal, Tweet (11:00 pm, 28 April 2024), <https://x.com/ShalitEyal/status/1784689125947211963>: “Listen you idiot [lit. donkey]. I’m the commander of the aid convoys that enter Gaza daily. There is no hunger there. You are a lying demagogue, an idiot that doesn’t understand how the court in the Hague works and what its goals are. It would be better that you and the rest of those collaborating with the enemy in your [political] camp disappear because the damage you cause is worse than the one Hamas causes. Truly an idiot, shut up.”

²⁵⁵ Younis Tirawi, @ytirawi, Tweet (11:33 pm, 13 September 2024), <https://x.com/ytirawi/status/1834706888514052110>; Original at Eyal Shalit Snir, @ShalitEyal, Tweet (10:05 pm, 15 December 2023), <https://x.com/ShalitEyal/status/1735752853971468798>.

²⁵⁶ Younis Tirawi, @ytirawi, Tweet (11:44 pm, 13 September 2024), <https://x.com/ytirawi/status/1834709702522863643>; Original at Eyal Shalit Snir, @ShalitEyal, Tweet (4:01 am, 13 February 2024), <https://x.com/ShalitEyal/status/1757223466531516771>.

²⁵⁷ Lt. Col. Shauli Sanker, Facebook (29 December 2023), <https://www.facebook.com/shauli.sanker.1/posts/pfbid037Dyj8sxQmqpea5Nnkhq5pJEKBDmmzyjKctp7YbHkaMpM2Wr7mcwegZFkRa6PUi6Cl>, also available at Younis Tirawi, @ytirawi, Tweet (9:26 pm, 4 June 2024), <https://x.com/ytirawi/status/1798073737893511506>.

- On 15 January 2024, **Lieutenant Colonel Yachiel Amoyal from the Nahal Brigade** explained on Kol Barama Radio that “[o]n the most technical level . . . when we identify people in the northern [Gaza] Strip we shoot them. Anybody who’s wandering around there is presumed to be a terrorist and we hit them. . .”.²⁵⁸ The Nahal Brigade was serving in the assault on Beit Hanoun in North Gaza in December 2024.²⁵⁹
- On 24 January 2024, **Lieutenant Colonel Tal Bibi, senior officer and Commander in the Nahal Brigade**, called for the extermination of people in Gaza, posting: “I’ve said from the beginning that Eliyahu Yosian²⁶⁰ is right. 100 thousand... 200 thousand Gazans should be taken down at once. And what to do with the rest??? Expel the rest to the sea / distribute them to countries around the world - to whoever agrees to take them, if at all. And then level Gaza and demilitarize the area. Doesn’t matter what they’ll say, they’ll slander... defame . . . twist . . . No compassion or pity for anyone living there — there are no uninvolved. There is no such thing as uninvolved. You are welcome to read the testimonies of the hostages and then you will understand exactly. Hague. . . Schmag. . .”.²⁶¹
- On 7 October 2023, **Major Amit Eylon** called for the extermination of Gaza, stating: “Now they said on the news something that’s been heard since this morning: the entire army is in Judea and Samaria and the Gaza division is empty of soldiers – what a disgrace! My heart is with the victims. Now we need to be [like] the landlord who lost their mind — kill and destroy everything and flatten Gaza. Whoever stays there is sentenced to death. Good luck to all our forces[.] Take care of yourselves.”²⁶²
- On 7 October 2023, **Major Meir Layosh** posted on Facebook: “Don’t give us photo ops of government meetings, don’t give us videos from the field, don’t give us stern-faced declarations. Show us one short video of rivers of blood flowing in Gaza, not of our soldiers or civilians. Nothing more than that”.²⁶³ In another post on the same day, he stated: “[t]o destroy, to kill and to annihilate”.²⁶⁴
- In October 2023, **Israeli Major and volunteer police officer, Mikito Shoshan**, said in a video: “My name is Miki, I’m a Major in the IDF Reserves and I’m also a volunteer police officer in the Israeli police. I got a message for the people of Gaza, the terrorists inhabiting Gaza. You’ll bitches better start running. Anybody who’s gonna be left in Gaza, when we get there, all y’all are gonna

²⁵⁸ “Lieutenant Colonel Yehiel Amoyal: ‘they are unable to shoot long-distance in the Northern Strip’”, *Kol Barama Radio* (15 January 2024), <https://kol-barama.co.il/item/%D7%A1%D7%90%D7%9C-%D7%91%D7%9E%D7%99%D7%9C-%D7%99%D7%97%D7%99%D7%90%D7%9C-%D7%90%D7%9E%D7%95%D7%99%D7%90%D7%9C-%D7%91%D7%A6%D7%A4%D7%95%D7%9F-%D7%A8%D7%A6%D7%95%D7%A2%D7%94-%D7%94%D7%9D-%D7%9C/>, also available at Younis Tirawi, @ytirawi, Tweet (1:14 pm, 28 December 2024), <https://x.com/ytirawi/status/1872979346815893814>.

²⁵⁹ Emanuel Fabial, IDF carries out airstrikes as troops launch new raid in northern Gaza’s Beit Hanoun, *The Times of Israel* (28 December 2024), https://www.timesofisrael.com/liveblog_entry/idf-carries-out-airstrikes-as-troops-launch-new-raid-in-northern-gaza-beit-hanoun/.

²⁶⁰ See *infra*, Annex III: INCITEMENT TO GENOCIDE.

²⁶¹ Lt. Col. Tal Bibi, Facebook (24 January 2024), <https://www.facebook.com/talbib1/posts/pfbid037fkKh837dhJs62F6GMmencVNAM5tbaUkJV4WMyijJoXQ1GHnJNT6tvuRSu6eSUDtI>, also available at Younis Tirawi, @ytirawi, Tweet (8:05 pm, 27 May 2024), <https://x.com/ytirawi/status/1795154408327549328>.

²⁶² Maj. Amit Eylon, Facebook (7 October 2024), <https://www.facebook.com/amiteylon/posts/pfbid02pUZPSVz7KbD3J6CyHUyPxu3cVhaxhNHw3cvEUf7u4rcWm7QaTHVV8mKCYdZ9KJ9MI> (original since removed), also available at Younis Tirawi, @ytirawi, Tweet (11:57 am, 30 May 2024), <https://x.com/ytirawi/status/1796118635007643880>.

²⁶³ Maj. Ben Zion Meir Layosh, Facebook (7 October 2024), <https://www.facebook.com/meir.layosh/posts/pfbid0BZPnbynYa7hGZF8CZz2Ritm9au6HwrjTGZVhJzxAvA9A22gKcGgiFnp2J3GYTixWl>, also available at Younis Tirawi, @ytirawi, Tweet (8:57 pm, 25 June 2024), <https://x.com/ytirawi/status/1805676646953107848>.

²⁶⁴ Maj. Ben Zion Meir Layosh, Facebook (7 October 2023), <https://www.facebook.com/meir.layosh/posts/pfbid0aGaTUpvXKKJPF3aek2Qkpr6STGeMfYwYmZ4Jn5NwT5edcy2VYm3dEYPz8tA4phqpl>, also available at Younis Tirawi, @ytirawi, Tweet (8:57 pm, 25 June 2024), <https://x.com/ytirawi/status/1805676646953107848>.

die. Each and every one of you. Your houses are going to be demolished. Your family ain't going to have no place to live. Better start running. Before you start running, you better return our people safe. Fail to do so, and we are about to open the goddamn gates of hell on your ass. You all started messing with God's army, with God's chosen people. We buried 20 bigger empires than a bunch of bearded goat-loving motherfuckers like you. We outlived for 5,000 years, you're just a speck in our history. You just unleashed the biggest shitstorm that's coming your way. So I suggest you leave Gaza, and you never ever return. That's our territory now. You're done there. Leave or die."²⁶⁵

- On 3 November 2023, **Major David Portal** posted on Facebook: "I want to win and victory has one way, killing the enemy, I will say it more bluntly; at least 100,000 enemy corpses[.] And when I say at least, I expect hundreds of thousands more! You win with the help of mathematics, not psychology, certainly not the twisted one that made us think we are dealing with human beings. Human psychology does not work on the devil . . . The 'attack Roger and out' command should be accompanied by an additional command: Annihilation, annihilation, Roger and out! Good news and Shabbat Shalom us all."²⁶⁶
- On 19 February 2024, **Major Hagar Amar** posted on Facebook: "When you forget... remember!!!! There is not a single male human or female human in Gaza. There are only those destined to die. From the smallest to the greatest. Entire families were murdered and exterminated. No one had mercy on us on 10/7. The compassionate heart of the Jews must not soften!!! Am Yisrael Chai [the people of Israel live]. We will win".²⁶⁷ On 25 April 2024, commenting on footage of Palestinians in Gaza at the beach, she stated, "Overall, they're not suffering there in Gaza. Those destined to die [in original Hebrew: 'sons and daughters of death' — a biblical idiom quoted from I Samuel 20:31. It is used to describe someone who is intended for death] are frolicking in the water. He who shows mercy to the cruel . . .".²⁶⁸
- On 11 October 2023, **Captain Elad Gabian of the Carmeli Brigade of the Israeli military** posted on Facebook: "the writing was on the wall that there are Arabs who are literally following in the Nazi's footsteps . . . My request is very simple and doesn't even cost money. My request is that you do not acquiesce to the reality that such Nazis still exist in the world. That's it, that's all. They and their families should be exterminated to the very last one of them. To clarify, their children must die as well, they drank in this evil from the breasts of their pig of a mother, and [they] will pass on this evil to their children as well. Maybe it's hard for some of you to say this, to think it, or even to read the words I just wrote out of some twisted and confusing feeling of pity. If we do not destroy them to the very last one, this story will repeat itself. [You may go ahead] and write a letter right now to your grandchildren explaining how and why we didn't destroy this evil when we could."²⁶⁹

²⁶⁵ Younis Tirawi, @ytirawi, Tweet (9:29 am, 16 July 2024), <https://x.com/ytirawi/status/1813113726201176185>.

²⁶⁶ Maj. David Portal, Facebook (3 November 2023), <https://www.facebook.com/dudu.portal/posts/pfbid02F63y5Kcw4cUpWs2y8AtTpv8rajHB8j5x7EBFcG8ChzzzATqJbRRRTG6nVjrWuvW5hl>, also available at Younis Tirawi, @ytirawi, Tweet (11:50 pm, 12 June 2024), <https://x.com/ytirawi/status/1801009252112179226>.

²⁶⁷ Maj. Hagar Amar, Facebook, (19 February 2024), <https://www.facebook.com/hagar.amar.5/posts/pfbid02va5Vfq1zCvsm5zFytRww1BZdZ3Do133y9uoredolhTkBBgoXRV1mF9UHZMTCxPVul>, also available at Younis Tirawi, @ytirawi, Tweet (9:58 pm, 8 June 2024), <https://x.com/ytirawi/status/1799531499735117847>.

²⁶⁸ Maj. Hagar Amar, Facebook (25 April 2024), <https://www.facebook.com/hagar.amar.5/posts/pfbid0KhQ6DSUHJkF98Sp3rMDVGVWU4jpYiUvRUAXXR47f4DAvVHxmGRp5Eh4XWb4YT9xYql>, also available at Younis Tirawi, @ytirawi, Tweet (9:58 pm, 8 June 2024), <https://x.com/ytirawi/status/1799531499735117847>.

²⁶⁹ Cpt. Elad Gabian, Facebook (11 October 2023), <https://www.facebook.com/eladgab/posts/pfbid02LXDYBkkt7du4ywL3QzMesa3i3xiyXcCeW3v7zZTQv5nqUSqRtAVNNGHtux3VMspgl>, also available at Younis Tirawi, @ytirawi, Tweet (11:56 pm, 26 May 2024), <https://x.com/ytirawi/status/1794850243982286863>.

- On 13 October 2023, **First Sergeant (res.) Ezra Yachin, Israeli Army reservist and veteran of the Nakba**, addressing soldiers, stated: “Go forth and be triumphant! Hurt them as much as possible, so their memory will be erased. So not them, not their mother, not their child or their babies — they shouldn’t be allowed to live, these animals. These days, we will have no other choice. We’ll be hit by more missiles from the Hezbollah and all the Arabs in the land will rise against us. And then we will have no other choice. Whoever has a weapon will shoot them [the Arabs]. If you have an Arab neighbor, you’re not going to wait for him to come to your house. Go to his house and shoot him. Strike them before they launch their missiles. Don’t wait for [unclear] to operate [unclear] the Iron Dome. Attack them in advance.”²⁷⁰
- On 27 December 2023, **Israeli soldier Elad Humnier** posted on X a video of destroyed Gaza, with the caption “Beit Lahiya, northern Gaza Strip ❤️ 80 days of IDF assaults”.²⁷¹ In response to a reply to this video — which stated “Unfortunately [we] still see buildings”²⁷² — he responded, “I hope that the residents of Gaza will become skeletons like their buildings”.²⁷³
- On 14 March 2024, **a soldier from Bislamach Brigade** uploaded a video in which he stated “Gaza is my dick . . . Death to Arabs . . . Death to Arabs!”.²⁷⁴
- **An Israeli soldier from Givati brigade** filmed burning buildings while stating “Oh, Gaza is burning. May you burn alive, you sharmutas”.²⁷⁵

Amalek and other Biblical Edicts

25. Senior officers and soldiers in the Israeli military have also used Biblical metaphors in order to call for the direct killing or extermination of Palestinians in Gaza. They have continued to invoke the Prime Minister’s ‘dogwhistle’ references to Amalek,²⁷⁶ and repeatedly reference other Biblical episodes of extermination, such as Simeon and Levi:²⁷⁷

- On 2 November 2023, speaking on a popular Israeli radio programme, **Israeli army Colonel (Reserve) of the 162nd Division, Erez Eshel** — a settler, co-founder of a number of pre-military academies,²⁷⁸ and trainer of senior Israeli officials,²⁷⁹ whose army unit is operating in Rafah²⁸⁰ — stated “ Hamas, who are

²⁷⁰ Bazz News, @1717Bazz, Tweet (8:39 pm, 11 October 2023), <https://twitter.com/1717Bazz/status/1712176168823107986>, also available at Middle East Eye, @MiddleEastEye, Tweet (9:48 pm, 13 October 2023), <https://twitter.com/MiddleEastEye/status/1712918166437806294>.

²⁷¹ Elad Humi, @EladHumi, Tweet (10:01 pm, 27 December 2023), <https://x.com/EladHumi/status/1740100675034566851>.

²⁷² Moran T, @MoranT555, Tweet (10:05 pm, 27 December 2023), <https://x.com/MoranT555/status/1740101588629557536>.

²⁷³ Elad Humi, @EladHumi, Tweet (10:15 pm, 27 December 2023), <https://x.com/EladHumi/status/1740104029156323330>, also available at Younis Tirawi, @ytirawi, Tweet (11:58 pm, 9 August 2024), <https://x.com/ytirawi/status/1822029662802837944>.

²⁷⁴ Younis Tirawi, @ytirawi, Tweet (11:27 pm, 14 March 2024), <https://twitter.com/ytirawi/status/1768388440876306830>.

²⁷⁵ Younis Tirawi, @ytirawi, Tweet (1:30 am, 2 March 2024), <https://twitter.com/ytirawi/status/1763708375626359153>. “Sharmuta”: Arabic word for bitch, also meaning slut/whore. Used in Hebrew.

²⁷⁶ Ministry of Foreign Affairs, *Statement by PM Netanyahu* (28 October 2023), <https://www.gov.il/en/pages/statement-by-pm-netanyahu-28-oct-2023>; Prime Minister’s Office in Hebrew, @IsraeliPM_heb, Tweet (1:43 pm, 3 November 2023), https://twitter.com/IsraeliPM_heb/status/1720406463972004198.

²⁷⁷ Sefaria, Genesis 34:25, JPS, 1985, <https://www.sefaria.org/Genesis.34.25?lang=bi&with=all&lang2=en>: “On the third day, when they were in pain, Simeon and Levi, two of Jacob’s sons, brothers of Dinah, took each his sword, came upon the city unmolested, and slew all the males.”

²⁷⁸ Me’ever, *Founding Members*, <https://meveryouth.org/our-team>.

²⁷⁹ “Emily Amrusi in a conversation with Col. Erez Eshel”, *Kan - moreshet* (2 November 2023), <https://youtu.be/3O77E9hotw0?si=H89qWVrNYlk-FPYQ> [18:00]: “except for one division commander, all the division commanders were my students in the division commanders’ course”.

²⁸⁰ Yoav Zitun, “IDF controls half of Philadelphia Corridor: This is how Israel’s operation in Rafah is progressing”, *Yedioth Ahronoth* (20 May 2024), <https://www.ynetnews.com/article/skp3i1lyq0>. See “Commander of IDF’s 162 Division says its soldiers are ‘at the gates of Gaza City’”, *The Times of Israel* (1 November 2023), https://www.timesofisrael.com/liveblog_entry/commander-of-idfs-162-divison-says-its-soldiers-are-at-the-gates-of-gaza-city/.

the embodiment of Amalek in the world”, “now suddenly [these] concepts become clear to us, there is [such a thing as] an Amalek. Every time when we squirmed uncomfortably in chairs, ‘to blot out the memory of Amalek’ from under the heavens [Deuteronomy 25:19] . . . there is an Amalek in the world. There is pure evil in the world . . .”. He went on to explain that: “There is [such a thing as] a pure evil and it hates people, and it isn’t an individual evil, it isn’t some Eichmann or Demjanjuk. There are millions of people, women and children, who carry this evil. And this war will end when the people of Israel will fulfil its role to eradicate this evil. Every Hamasnik, every Hamas supporter, every supporter — gett [short for Gett Kritut — a Jewish concept of total disengagement²⁸¹]. . . Every Muslim Arab needs — that wants to connect and be an ally with our people — shouldn’t say we are coming to fight terror. We want to destroy Hamas and their supporters. So there is pure evil in the world, and I realize this. . .”.²⁸² This echoes the words of the Minister of National Security that “when I say we need to annihilate Hamas, it’s not just Hamas, [not just] those who are registered, it’s also the distributors of candy . . . So it be clear what we need to do in this war: the distributors of candy . . . those who support, those who sing, they too [we] need to eliminate”.²⁸³

- On 9 October 2023, **Lieutenant Colonel Adi Bekore** posted “Now go, attack the Amalekites and totally destroy all that belongs to them. Do not spare them; put to death men and women, children and infants, cattle and sheep, camels and donkeys. [I Samuel 15:3] — The commandments of God from the mouth of Samuel to King Saul”.²⁸⁴
- On 23 January 2024, **Major Ilan Arad**, posted *inter alia*, “You shall blot out the memory of the Amalek from under heaven . . . There is an uncompromising joint Israeli struggle here. Against sheer evil, [a]gainst inhuman Nazi-like devilishness, [a]gainst monstrousness rarely seen in the history of nations, [a]gainst pure psychopathy . . . We must continue the military effort... forcefully, [t]o completely prevent any supply to the Gaza Strip, [t]o reach the captives by our own forces, [a]nd to free them with our special units. . . We must pursue them to the end, [c]ontinue dismantling the city of Gaza to its foundations, [l]eave no stone unturned in the modern Sodom of the 21st century, [a]nd not even dream of stopping for a moment . . . Be strong and courageous, warriors. We are all shedding a huge tear today, [a]nd continuing onward until the imminent victory, [u]ntil the release of the captives, [a]nd until the complete destruction of the seed of Amalek...”.²⁸⁵
- On 22 October 2023, **Major Yaakov Selavan** posted on Facebook: “Wipe out the memory of Amalek from under the heaven [Deuteronomy 25:19]”.²⁸⁶

²⁸¹ Translator note: Gett is also the name for Jewish divorce papers — the idea being that the divorce is that complete disconnection between former husband and wife.

²⁸² “Emily Amrusi in a conversation with Col. Erez Eshel”, *Kan - moreshet* (2 November 2023), <https://youtu.be/3O77E9hotw0?si=H89qWVrNYIk-FPYQ>, [10:58].

²⁸³ Interview with Itamar Ben-Gvir on Channel 12, 11 November 2023, <https://www.youtube.com/watch?v=2yRl-cc-D3w> [10:30 onwards].

²⁸⁴ Lt. Col. Adi Bekore, Facebook (9 October 2023), <https://www.facebook.com/adi.bekore/posts/pfbid0ktN8xRT2iuTb4bgMUECmZLaqBVxy38A71bRTYCdsX8s7ocjC5cjVLW6b2rS1ZwQil>, also available at Younis Tirawi, @ytirawi, Tweet (10:38 pm, 11 October 2024), <https://x.com/ytirawi/status/1844840031690899724>.

²⁸⁵ Maj. Ilan Arad, Facebook (23 January 2024), <https://www.facebook.com/aradaviation/posts/pfbid0N9ba9qjMdpYrPA4hkhW9U7ja9r7QQGePPW7tT2epUf3Mnys6ioSSoDsDqBHs7sul>, also available at Younis Tirawi, @ytirawi, Tweet (12:47 pm, 4 July 2024), <https://x.com/ytirawi/status/1808814860483875012>.

²⁸⁶ Maj. Yaakov Selavan, Facebook (22 October 2023), <https://www.facebook.com/yaakov.selavan/posts/pfbid02Z1SNbgy1gf6gLmPu9asJc4Qfm6oPUo5TusU2QfFMMrMhAFCCugDMvcoXYnVujqXl>, also available at Younis Tirawi, @ytirawi, Tweet (3:39 pm, 11 July 2024), <https://x.com/ytirawi/status/1811394787502637312>.

- On 7 October 2023, **Israeli Major Mikito Shoshan, also a volunteer police officer**, posted: “In the meantime I occasionally read some of your comments from both sides [politically] and shake my head in disbelief — have you lost your minds? The seed of Amalek has risen to kill us . . . Right now we [must] do two things: eradicate the seed of Amalek to the last one on a biblical scale, and take care of our brothers in the south”.²⁸⁷ On 11 October 2023, he posted: “The seed of Amalek made the same classic mistake again, thinking it can injure a sleeping bear just because it’s sleeping. Now there’s a wounded, angry bear looking to tear apart everything in its path. Gaza will be flattened, its residents will become refugees or find themselves under the rubble. What once was — will be no more. And in the north, they are testing our patience. If they miscalculate there too, Lebanon will become a parking-lot and we will indeed have a new Middle East.”²⁸⁸
- On 20 December 2023, a video was posted online of **Major Yair Ben David, of the 9208th Battalion** stating that the Israeli military’s “Battalion 9208 entered Beit Hanoun and did in Beit Hanoun what Simeon and Levi did to the city of Shechem. But the mission is not over yet; the mission is not over, we still have all of Gaza to do what we did to Beit Hanoun. All of Gaza should look like Beit Hanoun looks [today]”²⁸⁹. Beit Hanoun was devastated by the Israeli army.²⁹⁰ On 21 December 2023, **Colonel Tsachi Fenton**, captioned the aforesaid video of Yair Ben David of the 9208th Battalion of the Israeli army, with these words: “Don’t Forget Shimon and Levi”.²⁹¹
- On 29 October 2023, **Captain Koren Moridi** posted on Facebook: “There is no way to achieve the biblical vision of peace . . . without going through ‘wipe out the memory of Amalek from under the heavens.’ Whoever truly believes in good — must eradicate evil.”²⁹²
- On 12 November 2023, **35th Paratroopers Brigade, Israeli Captain Meir Rapaport**, posted a picture of himself in the ruins of a Palestinian home in the North of Gaza City, with the caption: “[w]e will erase the memory of Amalek from under the heavens, and we shall not forget!”.²⁹³
- On 27 May 2024, **Warrant Officer Ronen Bernshtein** posted on Facebook “. . . You kidnapped our brothers, You opened the gates of hell on your heads, Sons of Amalek, know that this is not even the middle of the story, this is just the beginning! Let every Arab mother know, from now on your children’s fate is in our hands! . . . We will burn you alive! We will pulverize, slaughter and break you mercilessly! . . . you are going to count many more [dead] bodies!”.²⁹⁴

²⁸⁷ Younis Tirawi, @ytirawi, Tweet (9:35 am, 16 July 2024), <https://x.com/ytirawi/status/1813115322829849055/photo/1>.

²⁸⁸ Younis Tirawi, @ytirawi, Tweet (9:40 am, 16 July 2024), <https://x.com/ytirawi/status/1813116560015310987>.

²⁸⁹ “Israeli army officer vows to turn entire Gaza Strip into rubble similar to situation in Beit Hanoun”, *Anadolu English* (20 December 2023), <https://www.youtube.com/watch?v=NK8ZnGKspeI>, also available at “War on Gaza: Israeli commander vows to flatten ‘entire’ Gaza Strip”, *Middle East Eye* (21 December 2023), <https://www.middleeasteye.net/news/war-gaza-israeli-commander-vows-flatten-entire-gaza-strip>. Original video at: YinonMagal, @YinonMagal, Tweet (9:57 am, 19 December 2023), <https://x.com/yinonmagal/status/1737019245538464167>.

²⁹⁰ *Ibid.*

²⁹¹ Younis Tirawi, @ytirawi, Tweet (12:40 pm, 9 June 2024), <https://x.com/ytirawi/status/1799753454052929938>.

²⁹² Cpt. Koren Moridi, Facebook (29 October 2023), [https://www.facebook.com/koren.moridi/posts/pfbid02FfrpTNSesLUh3rPNuqd11gDnK8fuzftD8i3aXY5Udi7gTeuDFbrSPDhAWrJktwt7l?__cft__\[0\]=AZXkY18H2aCgZS9R20Sn23BxoVPM8txz-b5eZTN_-oEv9rOX0VMnJS_ubfm_t0gjQYT10gmRkECR6wifK30tDCVA6F3f9Nr3W1RozENWTgFualk2wMw113aDExIqucOy-QOkfkohwd3EluuSUXFKp5CJUM-aHXIF0da4aucMidUWtgHJ8OJWFHjMzvVRI_1JNBs&__tn__=%2CO%2CP-R](https://www.facebook.com/koren.moridi/posts/pfbid02FfrpTNSesLUh3rPNuqd11gDnK8fuzftD8i3aXY5Udi7gTeuDFbrSPDhAWrJktwt7l?__cft__[0]=AZXkY18H2aCgZS9R20Sn23BxoVPM8txz-b5eZTN_-oEv9rOX0VMnJS_ubfm_t0gjQYT10gmRkECR6wifK30tDCVA6F3f9Nr3W1RozENWTgFualk2wMw113aDExIqucOy-QOkfkohwd3EluuSUXFKp5CJUM-aHXIF0da4aucMidUWtgHJ8OJWFHjMzvVRI_1JNBs&__tn__=%2CO%2CP-R), also available at Younis Tirawi, @ytirawi, Tweet (4:00 pm, 12 July 2024), <https://x.com/ytirawi/status/1811762464633053320/photo/2>.

²⁹³ Younis Tirawi, @ytirawi, Tweet (2:26 pm, 21 May 2024), <https://x.com/ytirawi/status/1792894629550973390>.

²⁹⁴ Younis Tirawi, @ytirawi, Tweet (12:06 pm, 16 September 2024), <https://x.com/ytirawi/status/1835621234995818820>.

- On 22 January 2024, a video was posted online of **Sergeant Major of the 84th (Givati) Brigade: Rabbi Avraham Zerbiv** — who was stationed in Khan Younis for four months²⁹⁵ — stating that he was “waiting for the [ten] plagues and signs that God gives”.²⁹⁶ The ‘ten plagues’ refer to the Biblical plagues sent by God to Egypt, including: turning water to blood, rendering it undrinkable; the plagues of lice; pestilence of livestock; hail and locusts destroying food sources; boils; darkness; and the deaths of all firstborn sons.²⁹⁷
- Around 7 December 2023, **Israeli military soldiers in uniform** filmed themselves dancing, chanting and singing “our slogan is known, there are no uninvolved” and “to wipe out the seed of Amalek”.²⁹⁸
- On 30 January 2024, in a video uploaded to social media, **a soldier in Gaza** is recorded saying: “I’m leaving Khan Younis . . . Thank God, we destroyed a vast land for them, we killed them, tens of thousands of Amalekites . . . The moral thing is to execute and kill all the terrorists, after they are investigated. The moral thing is to conquer and settle all parts of the Land of Israel. And every place where we leave remnants, will take revenge on us, sooner or later . . . Good luck to all of us, to all the people of Israel, in this great and important campaign.”²⁹⁹
- On 24 March 2024, **Liran Ben Shushan, an Israeli soldier from the 9203rd Battalion** commented on photographs and footage he posted on Facebook of Palestinian homes and neighbourhoods in Khan Younis completely destroyed by the Israeli military, stating: “[t]his year we got to keep the mitzvah [religious duty of Judaism] of blotting out Amalek!!!”³⁰⁰ and “[m]ay we complete the task”.³⁰¹
- In July 2024, footage was published of an **Israeli soldier from the 601st combat engineering battalion** blowing up buildings while saying: “To my dear wife Sarah. Are you ready? It’s going to be a big explosion, he he. Wow! Erase the memory of Amalek! Erase [it]! Take revenge on the Gentiles! Revenge!”.³⁰²
- On 30 January 2024 reportedly, in a video uploaded to social media, **a soldier in Gaza** was recorded saying: “I am now leaving Khan Yunis . . . Thank God, we destroyed a vast land for them, we killed them, tens of thousands of Amalekites . . . The moral thing is to execute and kill all the terrorists, after they are investigated. The moral thing is to conquer and settle all parts of the Land of Israel. And every place where we leave any remnants, will take revenge on us sooner or later . . . Good luck to all of us, to all the people of Israel in this great and important campaign.”³⁰³
- On 18 February 2024, a video was published online in which **Israeli soldiers in Gaza** recorded themselves composing ‘mock’ Biblical passages to describe what they called Israel’s “war of a biblical scale” against Gaza, including the verse: “[a]nd Israel shall chase the Philistines from the north [Gaza] strip to the

²⁹⁵ Avraham Zerbiv, Facebook (7 April 2024), https://www.facebook.com/permalink.php?story_fbid=pfbid02v5kjoQcQ36upyAehXMKVtSKKzw5S83ENQEi3Fc69VoLu3MaiG3tCtD4K85gESrwBl&id=100011062416421, also available at Younis Tirawi, @ytirawi, Tweet (12:59 am, 8 April 2024), <https://x.com/ytirawi/status/1777108859464700055>.

²⁹⁶ “Israeli soldier Rabbi Zerbiv invokes biblical ten plagues in context of Gaza”, *Middle East Monitor* (22 January 2024), <https://www.middleeastmonitor.com/20240122-israeli-soldier-rabbi-zerbiv-invokes-biblical-ten-plagues-in-context-of-gaza/>.

²⁹⁷ Sefaria, Exodus 7:14-12:36, JPS, 1985, https://www.sefaria.org/Exodus.7.14?lang=bi&vside=Tanakh:_The_Holy_Scriptures,_published_by_JPS|en&with=Translation%20Open&lang2=en.

²⁹⁸ Yinon Magal, @YinonMagal, Tweet (8:44 am, 7 December 2023), <https://twitter.com/YinonMagal/status/1732652279461757102>.

²⁹⁹ Middle East Eye, @middleeasteye, TikTok (30 January 2024), <https://www.tiktok.com/@middleeasteye/video/7330656784803188000>.

³⁰⁰ Liran Ben Shushan, Facebook (24 March 2024), <https://www.facebook.com/reel/948173186471996> (original since removed), also available at <https://web.archive.org/web/20240718115052/https://www.facebook.com/reel/948173186471996>.

³⁰¹ *Ibid.* See Younis Tirawi, @ytirawi, Tweet (2:33 pm, 27 March 2024), <https://twitter.com/ytirawi/status/1772965195683336261>.

³⁰² Younis Tirawi, @ytirawi, Tweet (9:58 pm, 4 July 2024), <https://x.com/ytirawi/status/1808953518935482818>.

³⁰³ Middle East Eye, @middleeasteye, TikTok (1 February 2024), <https://www.tiktok.com/@middleeasteye/video/7330656784803188000>.

south, and strike them a great strike”, “and they shall fight them”, “and not even one of them shall be left [alive]”.³⁰⁴

26. Israeli soldiers have also repeatedly filmed themselves shooting and killing animals — including horses and sheep³⁰⁵ — in hunger-ravaged Gaza, in actions evocative of the Biblical ‘commandment’ in relation to the Amalek (“Attack Amalek, and proscribe all that belongs to him. Spare no one, but kill alike men and women, infants and sucklings, oxen and sheep, camels and asses”).³⁰⁶ They have done this while in parallel filming themselves destroying mosques across Gaza,³⁰⁷ defacing mosques with offensive phrases,³⁰⁸ and defacing and destroying copies of the Quran,³⁰⁹ including setting a copy alight in a burning mosque.³¹⁰

Calls for Conditions of Life Calculated to Bring About Palestinians in Gaza’s Destruction

27. Israeli senior officers have also incited the destruction of the Palestinian group in Gaza through the specific means of depriving them of conditions of life:

- On 9 October 2023, **Israeli Lieutenant Colonel Shmuel Yagodaev** posted footage on Facebook of two soldiers closing down what appears to be a water pipeline, with the message: “Closing off of the water pipeline from Israel to Gaza. Let them drink water from the Gaza sea.”³¹¹ In the video, the soldier can be heard saying, “[a]t this very moment we are shutting off the water to Gaza. Good for us”.³¹²
- On 4 January 2024, **Lieutenant Colonel Shauli Sanker** reposted a letter advocating against humanitarian aid, deeming the whole of Gaza a “wicked and cruel nation”, saying: “I wasn’t included but I am signing on. No stopping until Hamas and Hezbollah are destroyed. No humanitarian aid should be allowed [into the Gaza Strip] until the hostages are released, and there should be no

³⁰⁴ Younis Tirawi, @ytirawi, Tweet (8:25 pm, 18 February 2024), <https://twitter.com/ytirawi/status/1759283063161282819>.

³⁰⁵ See Al Jazeera Egypt, @AJA_Egypt, Tweet (8:40 pm, 6 February 2024), https://x.com/AJA_Egypt/status/1754938005037711392; Al Jazeera English, @AJEnglish, Tweet (4:54 pm, 7 February 2024), <https://x.com/AJEnglish/status/1755258808161448284/video/1>; Gaza Notifications, @gazanotice, Tweet (5:08 pm, 17 August 2024), <https://x.com/gazanotice/status/1824825521487966303>.

³⁰⁶ *South Africa v. Israel, Application of 29 December 2023*, <https://www.icj-cij.org/sites/default/files/case-related/192/192-20231228-app-01-00-en.pdf>, p. 60, para. 101.

³⁰⁷ Younis Tirawi, @ytirawi, Tweet (11:54 pm, 11 April 2024), <https://x.com/ytirawi/status/1778542167612592554>. See Younis Tirawi, @ytirawi, Tweet (1:17 pm, 13 May 2024), <https://x.com/ytirawi/status/1789978344311648368>; Ran Oz, Facebook (7 February 2024), <https://www.facebook.com/100001992528868/videos/pcb.7160113260731687/3479421175641664>; available at Younis Tirawi, @ytirawi, Tweet (11:14 pm, 7 February 2024), <https://twitter.com/ytirawi/status/1755339296817455313>; Middle East Eye, @MiddleEastEye, Tweet (3:30 am, 6 February 2024), <https://twitter.com/MiddleEastEye/status/1754678805921509547>. See also Forensic Architecture, *A Spatial Analysis of the Israeli Military’s Conduct in Gaza since October 2023* (15 October 2024), https://content.forensic-architecture.org/wp-content/uploads/2024/10/FA_A-Spatial-Analysis-of-the-Israeli-militarys-conduct-in-Gaza-since-October-2023.pdf, pp. 555-560; Bellingcat, *Analysis Reveals Damage and Destruction of Cultural Heritage Sites in Gaza* (26 June 2024), <https://www.bellingcat.com/news/2024/06/26/gaza-israel-destroy-destruction-damage-cultural-history-heritage-archaeology-conflict-war/>, [9:18-10:40].

³⁰⁸ Forensic Architecture, *A Spatial Analysis of the Israeli Military’s Conduct in Gaza since October 2023* (15 October 2024), https://content.forensic-architecture.org/wp-content/uploads/2024/10/FA_A-Spatial-Analysis-of-the-Israeli-militarys-conduct-in-Gaza-since-October-2023.pdf, p. 539.

³⁰⁹ “Israeli soldier tears apart a Holy Quran and throws it onto the floor of a destroyed mosque in Gaza”, *Middle East Eye* (18 March 2024), <https://www.facebook.com/watch/?v=933158371601373>; Younis Tirawi, @ytirawi, Tweet (3:11 am, 22 April 2024), <https://x.com/ytirawi/status/1782215738477969722>; Younis Tirawi, @ytirawi, Tweet, (11:30 pm, 23 May 2024), <https://x.com/ytirawi/status/1793756431881294035>; Al Jazeera English, @AJEnglish, Tweet (4:15 pm, 25 August 2024), <https://x.com/AJEnglish/status/1827711277097242851>.

³¹⁰ Younis Tirawi, @ytirawi, Tweet (11:32 pm, 21 May 2024), <https://x.com/ytirawi/status/1793032057649512671>.

³¹¹ Lt. Col. Shmuel Yagodaev, Facebook (9 October 2023), <https://www.facebook.com/100030738703697/videos/1018373482838432>; Younis Tirawi, @ytirawi, Tweet (10:42 am, 7 June 2024), <https://x.com/ytirawi/status/1798998928798704093>.

³¹² *Ibid.*

special consideration for the non-involved. We must fight this wicked and cruel nation without compromise!”³¹³

- On 25 February 2024, **Lieutenant Colonel Eyal Shalit-Snir**, who, as indicated above, served in Gaza³¹⁴ and states that he “command[s] . . . the aid convoys that enter Gaza daily”³¹⁵ commented that “[We should] Destroy all infrastructure for living and create hunger”.³¹⁶ On 1 March 2024, he further called for Gaza to be starved: “Funny . . . Even before the Iron Swords war we were told there is a siege and hunger in Gaza but they had enough energy and strength to build tunnels. So let them truly starve this time. No mercy. So they truly won’t have the strength [power] to wholly slaughter people who think like you as [they did] on 7/10.”³¹⁷
- On 6 April 2024, **Lieutenant Colonel Shilo Granevich** said in a post on Facebook, “Humanitarian aid? They should drink from the sea of Gaza”.³¹⁸
- On 26 May 2024, in the immediate wake of the International Court of Justice’s Order of 24 May 2024, **Lieutenant Colonel Tal Bibi, senior officer and Commander in the Nahal Brigade**, warned Palestinians that they would get no aid, electricity, water or communications — also threatening Palestinian journalists — by posting on Facebook: “Hague Schmague United Nations Schmunitied Nations. . . from this moment on — this must be the way — 1. All reporters in the Gaza strip — you have 24 hours to leave, otherwise — we are not responsible for what happens to you. 2. Electricity, water, communications — total blackout . . . “0” aid trucks !!!!!!!!!!!!!!!!!!!!! total total media blackout. Gaza — 6 divisions enter neighborhoods and let’s goooooooooo lets get to work . . . All the garbage people in the Hague or the UN — sit quietly. . . he who comes to kill you — make sure you kill him first !!!!!!!!!!!!!!!!!!!!!!!!!!!!! A strong hand — media blackout and yallahhhhhhhhh [Hebrew/Arabic word meaning let’s go] destroy. Let’s bring back the honor, the deterrence, the security.”³¹⁹
- On 1 May 2024, **Major Yoel Tobiana, a commander in the 9308 Battalion**, posted: “Gaza should have been today, and actually not today, on the 8th of October, on its knees to such an extent, that the only negotiation that should have taken place with whoever remained from them is how many days do we let them pack before kicking them to all their 23 countries of peace and prosperity. You don’t negotiate with Nazis! [You] Crush them until they cry ‘enough!’ No ‘humanitarian’ aid for Nazis, no fuel, no electricity, hermetic closure [as in: blockade]. Conquer one kilometer after the other[,] day after day until they

³¹³ Lt. Col. Shauli Sanker, Facebook (4 January 2024), <https://www.facebook.com/shauli.sanker.1/posts/pfbid02PEhjQpm6u2SgxSmaNi1czpFxdKxukxxVRxp7MSynZoh87WYJKFmbboLWk4UScvSR1>, also available at Younis Tirawi, @ytirawi, Tweet (9:48 pm, 4 June 2024), <https://x.com/ytirawi/status/1798079325855760738>.

³¹⁴ Younis Tirawi, @ytirawi, Tweet (11:53 pm, 13 September 2024), <https://x.com/ytirawi/status/1834712034815987864/photo/1>.

³¹⁵ Younis Tirawi, @ytirawi, Tweet (11:22 pm, 13 September 2024), <https://x.com/ytirawi/status/1834704137298100719>, original at <https://x.com/ShalitEyal/status/1784689125947211963>: “Listen you idiot [lit. donkey]. I’m the commander of the aid convoys that enter Gaza daily. There is no hunger there. You are a lying demagogue, an idiot that doesn’t understand how the court in the Hague works and what its goals are. It would be better that you and the rest of those collaborating with the enemy in your [political] camp disappear because the damage you cause is worse than the one Hamas causes. Truly an idiot, shut up.”

³¹⁶ Younis Tirawi, @ytirawi, Tweet (11:28 pm, 13 September 2024), <https://x.com/ytirawi/status/1834705633888657513>.

³¹⁷ Eyal Shalit Snir, @ShalitEyal, Tweet, (2:42 am, 1 March 2024), <https://x.com/ytirawi/status/1834704146823258558>, original at <https://x.com/ShalitEyal/status/1763364317536075877>.

³¹⁸ Lt. Col. Shilo Granevich, Facebook (9:03 am, 28 May 2024), https://www.facebook.com/permalink.php?story_fbid=pfbid02oKHJiYK2tYdRycbt2iDEA6FXVXoLF1vS19fGrDY3J9uf7NUrXbuYZnVzQqXnihsHl&id=1291187088, also available at Younis Tirawi, @ytirawi, Tweet (9:03 am, 28 May 2024), <https://x.com/ytirawi/status/1795350148584976519>.

³¹⁹ Lt. Col. Tal Bibi, Facebook (26 May 2024), <https://www.facebook.com/talbibi1/posts/pfbid023UKUtbdjFNL67aaMqvuW9vcoswGzGT2QoCubulQNPLEFzmk6u2YJtLfSQ7Jj58gl>, also available at Younis Tirawi, @ytirawi, Tweet (8:00 pm, 27 May 2024), <https://x.com/ytirawi/status/1795153232873861172>.

scream out for us to take the hostages [away] from them. It is unbelievable that such a simple and basic thing needs to be written.”³²⁰

- On 22 November 2023, **Israeli Captain Eliah Sagron** called for the starvation and spread of disease among Palestinians in Gaza on his Facebook account, posting: “If we want to create deterrence, we need to start talking openly about occupation! We need to start talking about Hamas as an organization acting on civilians’ behalf, as it truly is, and act against all of Gaza’s residents — with a siege and permanent expulsion and in ways that will drastically reduce their population (We don’t necessarily have to do it ourselves; we can simply prevent the entry of fuel and medicine, and nature will take its course and they will die from epidemics there)”.³²¹ On 21 December 2023, he called for the halting of “humanitarian [supplies]” to “lead to a humanitarian disaster that may cause plagues which will quickly kill off most of them, so whoever doesn’t die of hunger will die of disease. This may be a little unpleasant but is good leverage to pressure the world’s countries to find them an alternative location”.³²²
- On 11 September 2024, **Israeli Master Sergeant in a Combat Engineering Battalion, David Zolden**, published a picture of himself getting immunised, stating: “Getting vaccinated against the Polio and Hepatitis epidemics raging in Gaza, but no vaccine will help Gaza at this point. [Gaza] is terminally ill and our role is to unplug it from the oxygen machines, the sooner the better.”³²³
- On 26 February 2024, **Israeli officer of the 98th Division, Uriel Ben Zvi**, posted a video of himself to Facebook stating: “We will leave them nothing. Look at these houses . . .”.³²⁴ On 16 March 2024, he posted another video on TikTok of a property in Gaza, commenting again: “We are here, from Gaza . . . [W]e will not leave anything for them” to which he added: “Everything will become sand and cholera . . . including this building.”³²⁵
- In March 2024, footage was published of an **Israeli soldier** stating “We blew up the houses of terrorists, mosques, UN offices . . . I remember we got into some UN office in charge of helping families in Gaza affected by the war. And we destroyed it”.³²⁶

³²⁰ Major Joel Tobiana, Facebook (1 May 2024), https://www.facebook.com/permalink.php?story_fbid=pfbid02T12PWqU6hQi4tPtDbPwoBoishLN7puyaWgjjUSN98exsxc8AJE8wqG6q1KctGwzml&id=100000078866654, also available at Younis Tirawi, @ytirawi, Tweet (2:48 pm, 16 June 2024), <https://x.com/ytirawi/status/1802322266367099250>.

³²¹ Cpt. Eliah Sagron, Facebook (22 November 2023), https://www.facebook.com/permalink.php?story_fbid=pfbid06k1zrcsDu6vV6yVcsElatfDYZXmrwGZWf5XZmAoyqU1b4xnqXorbAMV1AUkNiD1tl&id=1392169079, also available at Younis Tirawi, @ytirawi, Tweet (10:58 pm, 26 May 2024), <https://x.com/ytirawi/status/1794835524454146119>.

³²² Cpt. Eliah Sagron, Facebook (21 December 2023), https://www.facebook.com/permalink.php?story_fbid=pfbid02kwEbdYehMa2emDp6ARf4EpHTCv3wXdz6LbuBPrsCWHBW oWmGgcukHCvzqw88ado5l&id=1392169079. See Younis Tirawi, @ytirawi, Tweet (11:12 pm, 26 May 2024), <https://x.com/ytirawi/status/1794839045140271468>.

³²³ Master Sgt. David Zolden, Facebook (11 September 2024), https://www.facebook.com/permalink.php?story_fbid=pfbid0tCrFgdriiBC3HdY3amjQTK2icHg6g56ZcS7Rf8zinS7Q5Bhpump HJR4qn4TyHCwLl&id=1073566086.

³²⁴ Uriel Ben Zvi, @urielbenzvi, TikTok, (26 February 2024), https://www.tiktok.com/@urielbenzvi/video/7340019278311083271?_r=1&_t=8lPk7KCDT8a. “We will leave them nothing. Look at these houses, yeah right, [as if] they are living in crowded conditions, I wish I had a building like this, what is this. Look at how they live. They want for nothing. Only in the news they show you that they live, miserable, and in crowded conditions, but if you take a look it’s all villas here. Everything where we were, it’s all villas, villas. And at a distance from each other.”

³²⁵ Uriel Ben Zvi, @urielbenzvi, TikTok, (16 March 2024), <https://www.tiktok.com/@urielbenzvi/video/7346986561751256327>, also available at Younis Tirawi, @ytirawi, Tweet (17 March 2024), <https://twitter.com/ytirawi/status/1769316571984339025>.

³²⁶ Trita Parsi, @tparsi, Tweet (3:58 am, 22 March 2024), <https://twitter.com/tparsi/status/1770993422184149168>, excerpt from “‘Kill them all’: inside the Israeli blockade on Gaza aid”, *The Greyzone* (21 March 2024), <https://www.youtube.com/watch?v=LqRzfb2oMaM>.

- In April 2024, an **Israeli soldier** published footage saying: “As long as we’re tearing down a prickly pear orchard, why not eat some prickly pears? [Showing the camera a knife] A gift from Iron Swords. Blessed are thou, Lord, our God, King of the universe, Creator of the tree’s fruit. Amen.”³²⁷

Destroying Symbols of Palestinian Identity and Life

28. Statements by senior officers and soldiers in the Israeli military make it clear that the calls to eliminate Palestinians in Gaza and Palestinian life in Gaza include the elimination of symbols of Palestinians’ identity, and the intention to inflict such damage and harm upon the part of the Palestinian group in Gaza so as to make it impossible for the group to reconstitute itself:

- On 8 October 2023, **Major Avinoam Goelman, Commander in the 98th Division** of the Israeli army, posted on Facebook that: “[T]he strip needs to be reconquered. completely! Like we conquered Jerusalem and Judea and Samaria [the West Bank]. It is necessary to kill them without mercy. Without distinguishing between Hamas operatives and the civilian population because there is no such thing. The hundreds of people who slaughtered and kidnapped and looted and set fire to and abused bodies on Simchat Torah did not wear uniforms! . . . For me, everyone who lives in the Strip is a potential murderer. The ‘innocent’ civilians in Gaza are not innocent at all. For almost twenty years they raised and nurtured a murderous, evil, cruel regime, devoid of compassion. The residents of Gaza as a society have to pay with their bodies and souls the price of nurturing this evil rule. . . Gaza must be occupied and the entire leadership must be killed, including the interim leadership. All the mosques in Gaza must be destroyed because Hamas is a religious organization and it built its terrorist infrastructure in mosques. The ‘Sennacherib [Mentioned in the Bible, king of Assyria] policy’ must be adopted, i.e. [t]o take large families, break them up by resettling them in temporary residences in other areas of the Strip. Gazan society needs to be disintegrated from the inside, to sow pain, grief and loss in it in such a way that it cannot recover as a society with a cruel and criminal murderous narrative. We will have no choice. We will have to impose a military regime there, completely remove UNRWA and all aid organizations for murderers, we will have to establish a new education system, a new health system there (because the Shifa Hospital that has become a terrorist facility must be destroyed), and rehabilitate the residents in such a way that they will be able to work and live without any National rights at all. Maybe then it will be possible to live here in peace.”³²⁸
- On 19 December 2023, **Major Asaf Fried** posted on Facebook: “And as in all real wars, the road to victory goes through the enemy’s destruction and conquering their land. Destroying the enemy means also the total destruction of governance symbols and national sites. And indeed maybe for the first time, we hear that the IDF is destroying targets that are not only military targets[.] The demolition of the Supreme Court in Gaza (in the picture: before, during and after)[,] the destruction of the Islamic University. Waving the Israeli flag in the middle of ‘Palestine Square’ in the Rimal neighborhood, Gaza City’s luxury neighborhood. [But] Not before turning it into a parking lot for tanks. The demolition of the ‘Palestine Square’ in Shujaiya and the destruction of Hamas’s ‘Victory Memorial’ . . . intentional destruction of dozens of mosques, [which were] symbolic sites of Hamas. Yes, this is how you destroy an enemy. [You] [n]ot only kill its soldiers but

³²⁷ Itzikkzs9vo, @itzikkzs9vo, TikTok (18 April 2024), https://www.tiktok.com/@itzikkzs9vo/video/7403094822564728082?_r=1&_t=8pkXzuZqgKu.

³²⁸ Maj. Avinoam Goelman, Facebook (8 October 2023), <https://www.facebook.com/agoelman/posts/pfbid02QugAgjefNmAfJDpkaaiimruCTpqEGRZj8JFxEpBaynSAqPdkFasYipYHKmQZJvKl> (original since removed), also available at Younis Tirawi, @ytirawi, Tweet (10:30 pm, 26 May 2024), <https://x.com/ytirawi/status/1794828397018751045>, and at <https://archive.ph/EsodN>.

destroy its symbols . . . Destroying the enemy's national symbols is a clear statement that we're done playing around and that we want to win."³²⁹

- On 4 April 2024, **Sergeant Major of the 84th (Givati) Brigade, Rabbi Avraham Zarbiv** shared footage of a devastated Gaza, stating: "Just look at how destroyed the city is. Here, there was a school. You see, there is a school there. And there's no school here. There's no school this week in Al-Amal, Khan Younis. There's no school. Everything is destroyed."³³⁰
- In May 2024, **Israeli Sergeant Major Udi Ben Tora** filmed himself in front of the destroyed Azhar University in Gaza, stating: "We are in a university in Gaza . . . I think they're closed . . . How beautiful. Another angle of the ruins . . . We're starting a new semester . . . It'll start . . . Never."³³¹
- On 20 December 2023, **Master Sergeant David Zolden** posted videos of the destruction of Al Azhar University on Facebook, captioning these with: "On Saturday we loaded the mines and I signed off on the delivery that was changed on account of Shabbat [the Jewish sanctification of Shabbat traditionally requires halting work from Friday evening to Saturday evening], several days later we reassembled the mines and planted them in one of the symbols of Gaza's future — the Al Azhar University in the North of the Strip, which we then bombed. Below is a gallery of pictures from the unloading stage and all the way to the massive explosion of Battalion 749, which is working around the clock and doing essential work in the Gaza Strip".³³² On 19 November 2023, he had stated: "We stand at your threshold, Gaza, already passed through your gates and now are planting victory flags in the center of the enemy's capital. Israel's armies are forcefully striking the primeval snake to get even with these despicable scums of the human race . . . Gazan student, you could have become a nuclear scientist, you could have been in your fifth year of philosophy studies, and now, now what? Nails and feathers and destroyed dreams. Battalion soldiers who were killed while defending the nation — our people will forever hold this day in our hearts together with the splendor of your courage! A memento from the conquest of Gaza University November 2023. Death to the enemy — freedom for the homeland!"³³³
- On 10 March 2024, a video was shared of a burning school in Gaza: the video had been recorded and posted online by an **Israeli Sergeant from the 8717th Battalion of the Givati Brigade**, who declared: "Next year we'll burn the school and beat up all the teachers, too. Ah, it's so much fun to watch schools burn in Gaza. May they die, all these trash terrorists."³³⁴
- On 6 January 2024, **Israeli soldier Yishai Shalev** filmed himself in a TikTok video in front of buildings of the Al Azhar University in Gaza, which the Israeli military had demolished, stating: "For all those wondering why there's no school in Gaza[:] Oops, we dropped a missile on you, that sucks. Aww, too bad. That way you won't be[come] engineers."³³⁵

³²⁹ Maj. Asaf Fried, Facebook (19 December 2023), https://www.facebook.com/permalink.php?story_fbid=pfbid02rtTrLePv9srCuz5MxMxygSZYkWHfzZCnikCUE4bKDMc5jWQPqC7uzbRepUtkJoXcl&id=100000183658777, also available at Younis Tirawi, @ytirawi, Tweet (10:45 pm, 9 June 2024), <https://x.com/ytirawi/status/179905565990158408>.

³³⁰ Middle East Eye, @middleeasteye, Instagram (6 April 2024), <https://www.instagram.com/reel/C5afub9vR08/>.

³³¹ Younis Tirawi, @ytirawi, Tweet (10:54 am, 13 May 2024), <https://x.com/ytirawi/status/1789942261209325757>.

³³² Master Sgt. David Zolden, Facebook (20 December 2023), <https://www.facebook.com/1073566086/videos/pcb.10227852917843050/236566016129486> [00:44 onward]. See also Younis Tirawi, @ytirawi, Tweet (4:53 pm, 15 September 2024), <https://x.com/ytirawi/status/1835331007240655224>.

³³³ Master Sgt. David Zolden, Facebook (19 November 2023), https://www.facebook.com/permalink.php?story_fbid=pfbid0Ur6eZJjNSiqrVS6EnZAVQfbV1AKMPdqZkgzyruBqEqkXPn2bkSSjP4wm8VFW19KML&id=1073566086.

³³⁴ Younis Tirawi, @ytirawi, Tweet (7:40 pm, 10 March 2024), <https://twitter.com/ytirawi/status/1766912143444656544>.

³³⁵ Quds News Network, @QudsNen, Tweet (11:27 am, 6 January 2024), <https://x.com/QudsNen/status/1743565019453763780>.

Invocation by Israeli Soldiers of the 1948 Nakba of the Palestinians and Calls for the Israeli Settlement of Gaza

29. The 1948 Nakba ('catastrophe') of Palestinians — in which 750,000 of the Palestinian population at the time were permanently displaced from their homeland, their villages demolished to make place for Israeli villages and towns³³⁶ — is also repeatedly invoked by Israeli senior officers and soldiers to describe the Israeli military's conduct in Gaza or further engage in genocidal incitement, reflecting calls by Israeli politicians for 'another' Nakba to be visited on the Palestinians.³³⁷ By way of example:

- On 27 October 2023, **Lieutenant Colonel Shmuel Yagodaev** posted on Facebook: "Don't say you didn't know. . . After flattening Gaza, we must take action for Nakba 2 (and last) in Judea and Samaria as well! Only if we wake up from the illusion of peace, we can win!".³³⁸ On 10 November 2023, he posted: "Everyone is concerned with the question of 'the day after.' First of all, the plans for 'the day before' — is to win the war with a total victory, not next to [victory], not a pretend victory, a total victory! Burn Nakba 2 in their minds. As for the question of 'the day after'? It should look like this: Gaza returns to its state from 56 years ago, [in which] they are small, wounded, battered, busy burying their loved ones, and above all frightened, very frightened! There will be a large and significant Jewish settlement throughout the Strip, both along and across the Strip (all the settlements uprooted in the summer of 2005 would be reestablished, and more . . .), and Gaza is annexed with a military administration over the rural areas, allowing each village/clan (what remains of them) to manage their civil lives independently (cantons) and massively encouraging emigration to anywhere they wish in the world. Under no circumstance do we allow the Islamo-Nazis from Ramallah to control the strip. Do you support?". This post is accompanied with two pictures — one black and white of men being rounded up by the army, the other of skyscrapers against a beach, captioned, "Gaza 1967", "Gush Katif [a former Israeli settlement in Gaza] 2025".³³⁹
- On 11 October 2023, **Lieutenant Colonel Chen Levni** posted on Facebook, *inter alia*: "Nakba — now is the time, take two, this time in Gaza".³⁴⁰
- On 19 January 2024, Israeli officer **Sergeant Major Alex Gorelik** posted on Facebook a photograph of the destruction of Khan Younis, along with the caption "Nakba 2".³⁴¹

³³⁶ See e.g. United Nations, The Question of Palestine, *About the Nakba*, <https://www.un.org/unispal/about-the-nakba/>; Maher Charif, *The Nakba : Stages of Forces Displacement* in Institute of Palestine Studies, *Interactive Encyclopedia of the Palestine Question*, <https://palquest.palestine-studies.org/en/highlight/160/nakba>; Ilan Pappé, "An Indicative Archive : Salvaging Nakba Documents", *Journal of Palestine Studies* vol. 49 no. 3 (Spring 2020), <https://www.palestine-studies.org/en/node/1650358>.

³³⁷ See Annex I: STATEMENTS EVIDENCING GENOCIDAL INTENT AND INCITEMENT TO GENOCIDE BY SENIOR ISRAELI GOVERNMENTAL OFFICIALS; and *South Africa v. Israel, Application instituting proceedings and request for the indication of provisional measures of 29 December 2023*, <https://www.icj-cij.org/sites/default/files/case-related/192/192-20231228-app-01-00-en.pdf>, p. 62, para. 101.

³³⁸ Lt. Col. Shmuel Yagodaev, Facebook (27 October 2023), (https://www.facebook.com/permalink.php?story_fbid=pfbid037kqMhFRbSYvqjLHYFn8dYMsBGZ3TEBEFkKQy6yiPTGkZuYmr6vSULYeqesZAvsSl&id=100030738703697), also available at Younis Tirawi, @ytirawi, Tweet (10:45 am, 7 June 2024), <https://x.com/ytirawi/status/1798999662906778037>.

³³⁹ Lt. Col. Shmuel Yagodaev, Facebook (10 November 2023), https://www.facebook.com/permalink.php?story_fbid=pfbid0AwHvBzyKUPfXuSahzaw3eBhcNeNDegta9zNr6YP4YZ8xPBap5bycNMzd13CMk9cl&id=100030738703697, also available at Younis Tirawi, @ytirawi, Tweet (10:41 am, 7 June 2024), <https://x.com/ytirawi/status/1798998596089434225>.

³⁴⁰ Lt. Col. Chen Levni, Facebook (11 October 2023), https://www.facebook.com/permalink.php?story_fbid=pfbid02upnSE2dvRYm38Za15zEeXxtLpz8u9iLYm19N4Yzgdbwc7gUVco56tHieaQWR25rAl&id=100014996041949, also available at Younis Tirawi, @ytirawi, Tweet (9:42 pm, 19 September 2024), <https://x.com/ytirawi/status/1836853339453280514>.

³⁴¹ Sgt. Maj. Alex Gorelik, Facebook (19 January 2024), <https://www.facebook.com/gorelik.a/posts/pfbid02sJapGyAV6mGjdyeoJuetoonJBRbYz3FxsBYJmPngfFDVNVNT11AG47C9mi5Pms5il>, also available at Younis Tirawi, @ytirawi, Tweet (11:15 pm, 18 May 2024), <https://x.com/ytirawi/status/1791940730572984324>.

- On 17 February 2024, in a television interview broadcast on Channel 14 on his return from deployment in Khan Younis in Gaza, **Sergeant Major of the 84th (Givati) Brigade, Rabbi Avraham Zarbiv** stated: “I see victory. I see all their infrastructure being destroyed. I see that they don’t have one house [that’s not] demolished. I see hundreds of thousands fleeing like [the] Nakba, and walking towards exile!”.³⁴²
- On 16 January 2024, **Israeli military First Sergeant of the 9264th Battalion, Marom Harush** posted the following on social media: “Occupation expulsion and settlement. Any other solution is another band-aid to a wound that can’t contain it. Let all the Arab world know for generations to come that in the day when the Arabs of the Strip rose up [in attack] on Israel they got another Nakba. There is no forgiveness to the Palestinian ‘people’ and no additional opportunity. This is the only way we can secure Israel’s safety for generations to come”.³⁴³ On 20 April 2024, having received no official sanction for his genocidal rhetoric of 16 January, he continued to call for a second Nakba, posting: “On the seventh [of October] anyone who didn’t realize we’re fighting against pure evil realized it. There is truly a side here that is pure good and a side that is the pure evil. Just like we were sure of our righteousness in 48 and we did what needed to be done to ensure our existence like exiling entire villages and erecting Jewish cities on their ruins (Ashdod, Ashkelon, North Tel-Aviv and more) so we must do now. Return to Jewish identity and consciousness, believe in our righteous path and realize that the solution against the murderous and barbaric Islam can only be taking land. Another ‘Nakba’ is needed here. Expulsion[.] Occupation[.] Settlement[.] That is the equation. There is no other solution”.³⁴⁴ On Nakba Day, 15 May 2024, he further posted on Facebook: “The solution for the ‘day after’ is only: Occupation Expulsion And settlement. Exactly like in 48. Any other solution is like throwing sand in [our] eyes [common idiom describing an act of deception or obfuscation]”.³⁴⁵
- In January 2024, a **soldier serving in the Israeli military** posted video footage on TikTok of the bombing of a Palestinian building in Khan Younis superimposed with the text “Khan Yunis now, 7-10-2023 Nakba Now”.³⁴⁶
- On 19 January 2024, an **Israeli soldier** posted on Facebook: “The Flood of Khan Younis continues. 7.10.23 — Nakba 2”.³⁴⁷
- On 30 January 2024, **Israeli soldier Elad Humnier of the 8th brigade** posted a video of displaced Palestinians in Gaza on X with the caption: “The Nakba in the Gaza Strip is beautiful this morning. Very.”³⁴⁸
- In February 2024, a video was published online of an **Israeli soldier** in Gaza proclaiming: “They don’t realize what a disaster they brought upon themselves. . . The Nakba is about to become a sweet memory compared to what is going to befall them. Start running, because the IDF is on its way.”³⁴⁹

³⁴² “The Patriots with Yanon Magal: 17.02.2024 | The full program”, *Now 14* (17 February 2024), <https://www.youtube.com/watch?v=cpafZO-PMmo> [1:20:28].

³⁴³ Younis Tirawi, @ytirawi, Tweet (12:38 pm, 21 May 2024), <https://x.com/ytirawi/status/1793048787591561635>.

³⁴⁴ Marom Harush, Facebook (20 April 2024), <https://www.facebook.com/marom.harush/posts/pfbid0SjW5XaXYEihpsX9RtbEJkmADgK1peN5bgcfcVMo4hBXfKXSykjVQxytEv5ur7Z4jl>; Younis Tirawi, @ytirawi, Tweet (12:32 pm, 22 May 2024), <https://x.com/ytirawi/status/1793047312115040450>.

³⁴⁵ Marom Harush, Facebook (15 May 2024), <https://www.facebook.com/marom.harush/posts/pfbid031zUj6qsWm4rgwqVH1CHo5n6cmbccrX4NiL1fsSaXa3mWkQ5gsdxMhsYq5U4hrhKl>.

³⁴⁶ Younis Tirawi, @ytirawi, Tweet (11:33 pm, 14 April 2024), <https://x.com/ytirawi/status/1779624098248700011>.

³⁴⁷ Younis Tirawi, @ytirawi, Tweet (11:15 pm, 18 May 2024), <https://x.com/ytirawi/status/1791940730572984324>.

³⁴⁸ Elad Humi, @EladHumi, Tweet (9:19 am, 30 January 2024), <https://x.com/eladhumi/status/1752229981898281033?s=46>, also available at Younis Tirawi, @ytirawi, Tweet (11:58 pm, 9 August 2024), <https://x.com/ytirawi/status/1822029662802837944?s=12>.

³⁴⁹ Younis Tirawi, @ytirawi, Tweet (12:58 pm, 6 February 2024), <https://twitter.com/ytirawi/status/1754640691425124386>.

- On 14 April 2024, **Major Eitan Turgeman** ‘tweeted’: “The truest words you will read today, October 7th brought the second Nakba upon the Palestinians in Gaza, and thus it will be decreed that anyone who messes with the Jews ends up with total destruction, famine, and widespread disease. . . .”³⁵⁰
- In a photograph posted on social media on 18 May 2024, **Israeli soldiers** pose with a shot up building in Gaza on which the words “Nakba 2023” have been graffitied.³⁵¹

30. Senior officers and soldiers of the Israeli military have also called for the mass expulsion of Palestinians in Gaza. As with Israeli State officials and other public figures, such calls for expulsion are often linked to territorial ambitions over Gaza, as well as the desire to destroy Palestinian life in Gaza:

- On 29 January 2024, **Tsachi Fenton, Rabbi and Colonel (res.)**, in a video, warned Palestinians in the West Bank of the same violence Israel has inflicted on Palestinians in Gaza, stating: “Residents of the West Bank, are you Hamas supporters? Prepare yourselves. Soon the same thing will happen to you. Jenin, Tulkarem, Hebron, Ramallah, Halhoul, Bethlehem. After we are done with Gaza we will get to you with the tanks and jets. You will run away like in 1967. Prepare yourselves — soon it will happen to you. Don’t forget to take a water bottle, a blanket, a mattress, a white flag, an ID and money. ‘The armed Jewish Forces.’ Palestine is gone!!!”³⁵² On 5 June 2024, he posted a video on his YouTube Channel, recorded for the occasion of Jerusalem Day (the day commemorating the start of Israel’s occupation and administration of Jerusalem), stating while in uniform: “We will finish with a prayer, may it be Your will, may we have a happy Rafah day, and a happy Nablus day G-d willing, and a happy Gaza day, and a happy Hebron day. Truly, I say this to you wholeheartedly. Things that today seem to us, you know that G-d is omnipotent. Things that seem weird to us — the same way our forefathers thought it unimaginable that one day we will say happy Jerusalem Day — thus we will hope, G-d willing, for a great victory, for a great light, and we will sing in front of Him and say hallelujah.”³⁵³
- On 18 October 2023, **Lieutenant Colonel, Shilo Granevich** posted on Facebook: “So let’s state it again: Israel’s declared and definite goal must be cleansing Gaza of Nazis. Each speech should clarify that even if it takes three years, Israeli citizens will no longer live several hundred meters away from bloodthirsty Nazis. Just so. And given this reality, it makes no sense leaving innocent people in Gaza, if we can assume there are any there. . . . The means will follow from this [realization]: a global effort, assigning responsibility to Egypt and the Arab world, evacuating residents, enforcing a curfew, preventing movement northward, establishing refugee camps by the border and as southward as possible, transferring residents to Sinai/Egypt, full stripping of the territory of ‘upper Gaza’, siege and fighting until total surrender. It will take as long as it takes. . . . If we truly will it — it is no legend [a riff on Herzl’s famous saying regarding the establishment of a Zionist Jewish state: ‘if you will it — it is no legend’].”³⁵⁴

³⁵⁰ Eitan Turgeman, @Dr_eitant, Tweet (2:02 pm, 14 April 2024), https://x.com/Dr_eitant/status/1779480242983158223, also available at Younis Tirawi, @ytirawi, Tweet (7:12 pm, 3 November 2024), <https://x.com/ytirawi/status/1853138306592104847>.

³⁵¹ Younis Tirawi, @ytirawi, Tweet (12:32 am, 18 May 2024), <https://x.com/ytirawi/status/1791778870015709464>.

³⁵² Video available at Younis Tirawi, @ytirawi, Tweet (12:54 pm, 9 June 2024), <https://x.com/ytirawi/status/1799756904606093433>.

³⁵³ “Tsachi Fenton Thought and view: Jerusalem Day — Song of Redemption”, *Rabbi Tzachi Fenton* (5 June 2024), <https://www.youtube.com/watch?v=RuTsXfZv6vo> [25:09].

³⁵⁴ Lt. Col. Shilo Granvich, Facebook (18 October 2023), https://www.facebook.com/permalink.php?story_fbid=pfbid0xQSTYogDinNa8fTT6rEz7YaBDhid3VgfnmW9hkgBsMYWmJNxyNYWLQnFZchG2MTyPl&id=1291187088, also available at Younis Tirawi, @ytirawi, Tweet (8:54 am, 28 May 2024), <https://x.com/ytirawi/status/1795347979710202260>.

- On 13 June 2024, **Major Dovi Yudkin** called for the expulsion of *all* Palestinians from any part of the former Mandate of Palestine, posting on Facebook: “Anyone who creates distinctions within our enemy ensures distinctions [and divisions] are also created amongst ourselves . . . Hamas, Jihad, PLO, the Arab-Israeli enemy, they all live here with one sole desire — to slaughter us all, rape our women and girls and cook our children in the oven. We have to wake up. The conception [slang for a specific outlook or interpretation] is here. Deporting the Arab enemy to Arab countries. Declaring war on all kinds of terrorist organizations. The State of Israel for the people of Israel. Death to the murderous Arab enemy. This is what we need now, a change in perception and change in leadership, leadership with courage, leadership with integrity, leadership with purpose and direction. The nation of Israel lives.”³⁵⁵
- On 17 May 2024, **Captain of the 9260th Battalion of Brigade 282, and commander of a Combat engineering Corps Reconnaissance Platoon, Noam Nissan**, commented on X: “The Port is ready. We can start exporting Gazans”.³⁵⁶ On 1 September 2024, he posted: “Why are there still Arabs in the Northern Gaza Strip?”.³⁵⁷

31. The calls for Palestinians to be removed and destroyed relate to senior officers and soldiers’ intent to conquer and colonize Gaza — echoing similar calls extensively and publicly made by Israel’s senior political leadership:³⁵⁸

- On 23 December 2023, **Colonel Tsachi Fenton** posted on social media: “In Gaza, G-d willing[.] Gush Katif, how will it look like, through a visionary’s eyes? Dunes . . . certainly, palm trees . . . it’s a must, houses . . . villas, roofs... red, what a narrow perspective, this will not satisfy all those who wish to build their houses on the beach. This morning I was exposed to the vision of a person [tagged]Topaz Doitsch Ram who dreams big . . . huge . . . how Gush Katif should look like. Good luck!”.³⁵⁹
- On 23 February 2024, **Commander of the 931st Infantry Battalion of the Israeli army’s Nahal Brigade, Colonel Oz Meshulam**, told reporters from the newspaper Yedioth Ahronot, embedded with the Israeli army in Gaza that: “We occupied an area here, we bisected the Strip and we are the landlords here. The occupation of all of Northern Gaza is one of our biggest achievements. The goal of the corridor we created is to separate the North and the South of the strip, and to enact different rules in the Middle East.”³⁶⁰
- On 27 November 2023, **Lieutenant Colonel Aharon Wiesner** posted on Facebook, commenting on an article, “something true: the area of the northern Gaza Strip should be annexed . . . Because there is a price to [waging] war against Israel”. In the post, in response to a tweet by Gilad Sharon in an accompanying photo that stated that “territory of the northern Gaza Strip should be annexed when it is empty of population, because there is a price for a war

³⁵⁵ Maj. Dovi Yudkin, Facebook (13 June 2024), https://www.facebook.com/permalink.php?story_fbid=pfbid0P5mBQxEy4zdQfK1K1KHx2gjyuNc4zCTCKncxEG4LXwWQMEFNlnnp4CFBUyN455sGl&id=100056882382895, also available at Younis Tirawi, @ytirawi, Tweet (11:59 pm, 26 June 2024), <https://x.com/ytirawi/status/1806084802543509948>.

³⁵⁶ Younis Tirawi, @ytirawi, Tweet (7:24 pm, 4 August 2024), <https://x.com/ytirawi/status/1820148937635840124>.

³⁵⁷ Noam Nissan, @Noamnisan_, Tweet (10:14 pm, 1 September 2024), https://x.com/Noamnisan_/status/1830338486718873947, also available at <https://archive.ph/MIXSL>.

³⁵⁸ See Annex I: STATEMENTS EVIDENCING GENOCIDAL INTENT AND INCITEMENT TO GENOCIDE BY SENIOR ISRAELI GOVERNMENTAL OFFICIALS.

³⁵⁹ Younis Tirawi, @ytirawi, Tweet, (12:44 pm, 9 June 2024), <https://x.com/ytirawi/status/1799754387310739761>.

³⁶⁰ Dov Eichenwald, “‘We are the owners of the house here’: inside the axis that crosses the Gaza Strip”, *Ynet* (23 February 2024), <https://www.ynet.co.il/news/article/yokra13806889>.

against Israel”, Wiesner also complained: “but why ‘when it is empty of population?’”³⁶¹

- On 18 December 2023, **Lieutenant Colonel Shmuel Yagodaev** posted on Facebook: “Occupation, expulsion, settlement.!”³⁶²
- On 30 December 2023, **Lieutenant Colonel David Levi** posted: “Till total destruction . . . Government of Israel — do not dare to stop until total destruction. And then build Israeli settlements there”.³⁶³ In a video, he recorded himself saying: “Bibi, we cannot stop even for a minute. In Gaza, and also in Judea, Binyamin and Samaria there are Arabs, called by historical lie that you know, ‘Palestinians’, who are pure evil which concentrated into it the zoological hatred of the Nazis in Europe, along with the bloodlust [literally: lust for the knife] of the East. This pure evil must be eradicated. This pure evil must be defeated. And victory is a combination of annihilation of the enemies there [and] to drop the rest to their knees, humiliated. To liberate the land, to cleanse, to purify and to build new Israeli settlements. Victory is to return all the hostages, the living and the dead, without releasing one single two-legged animals from their number. Bibi, you’re leading the nation of Israel today and I wish to support you [literally: to strengthen you]. It is your moral obligation towards the people of Israel and we support you. At the same time we demand from you not to stop even for a minute. Because the Gazan scum who also nest in Judea and Samaria and amongst us, must be annihilated to the end, and in any way and by any means and I was gentle”.³⁶⁴ In a further video, he stated: “[t]he question is, what should our State do? One: continue taking Gaza apart and all of its residents [as well][.] Cause anyone who’s still alive there agonizing pain [literally: deathly pain][.] And release the hostages by force[.] There won’t be a deal with the devil and that’s why we need to fight him and destroy him[.] And then cleanse the area and build fully Jewish towns.”³⁶⁵
- On 28 January 2024, **Lieutenant Colonel Eyal Shalit-Snir** who, as indicated above, served in Gaza³⁶⁶ and states that he “command[s] the aid convoys that enter Gaza daily”,³⁶⁷ ‘tweeted’, responding to an Israeli journalist online: “I am a reserve soldier, you are a lazy draft-dodger, I was in Gaza and saw the reserve soldiers, most of them want to come back. We can only win via resettlement. We will build a new city named Be’eri on the ruins of Beit Hanoun, a city named Tkuma [Hebrew for rebirth] on the ruins of Gaza [City]. Zionism [you] idiot, that’s how we won then, in 48, settlement everywhere. That’s how you win. Oslo and retreats = death.”³⁶⁸

³⁶¹ Lt. Col. Aaron Wisner, Facebook (27 November 2023), <https://www.facebook.com/wiznron/posts/pfbid0ZP9FFfZUmaXCVQbSPRctYv4A6UUSTL6YHfQNUZ6q5AZoA87BFShnLJfsqLszauUFI>, also available at <https://x.com/ytirawi/status/1808041387813745136>.

³⁶² Lt. Col. Shmuel Yagodaev, Facebook (18 December 2023), https://www.facebook.com/permalink.php?story_fbid=pfbid035VTzw7cFdrXoXutYs7xkNBstHoHKK8tW8UyXpPFgRR1R1NACdiP76jBai4PdcCzJl&id=100030738703697, also available at Younis Tirawi, @ytirawi, Tweet (11:05 am, 7 June 2024), <https://x.com/ytirawi/status/1799004809221353943>.

³⁶³ Younis Tirawi, @ytirawi, Tweet (7:49 am, 19 June 2024), <https://x.com/ytirawi/status/1803304107614011612>.

³⁶⁴ Younis Tirawi, @ytirawi, Tweet (8:02 am, 19 June 2024), <https://x.com/ytirawi/status/1803307378735002096>.

³⁶⁵ Younis Tirawi, @ytirawi, Tweet (10:43 pm, 4 October 2024), <https://x.com/ytirawi/status/1842304485583905066>.

³⁶⁶ Younis Tirawi, @ytirawi, Tweet (11:53 pm, 13 September 2024), <https://x.com/ytirawi/status/1834712034815987864/photo/1>.

³⁶⁷ Younis Tirawi, @ytirawi, Tweet (11:22 pm, 13 September 2024), <https://x.com/ytirawi/status/1834704137298100719>, original at Eyal Shalit Snir, @ShalitEyal, Tweet (11:00, 28 April 2024), <https://x.com/ShalitEyal/status/1784689125947211963>: “Listen you idiot [lit. donkey]. I’m the commander of the aid convoys that enter Gaza daily. There is no hunger there. You are a lying demagogue, an idiot that doesn’t understand how the court in the Hague works and what its goals are. It would be better that you and the rest of those collaborating with the enemy in your [political] camp disappear because the damage you cause is worse than the one Hamas causes. Truly an idiot, shut up.”

³⁶⁸ Younis Tirawi, @ytirawi, Tweet (11:38 pm, 13 September 2024), <https://x.com/ytirawi/status/1834708162294710331>, original at Eyal Shalit Snir, @ShalitEyal, Tweet (12:56 am, 29 January 2024), <https://x.com/ShalitEyal/status/1751740983052497000>.

- On 28 April 2024, **Lieutenant Colonel Yonathan Bahat, Deputy Commander of Israel's 646 Brigade**, posted on Facebook: “[t]here should be no withdrawal from territories in Gaza, and certainly no lifting of the blockade to allow Gazans to return north. Gazans will have to pay a territorial price for their actions.”³⁶⁹
- On 2 September 2024, **Lieutenant Colonel Shauli Sanker** posted on Facebook, “I’ve been writing for months — we need to change the equation. We still haven’t woken up and understood what happened on 7.10. The Gaza Strip must burn and we should settle in the Strip”.³⁷⁰ On 18 August 2024, he said: “. . . Gaza cannot go back to what it was before October 7th. The fate of Gaza’s residents must be total exile and replacement by Israeli settlement.”³⁷¹
- On 29 October 2023, **Major Dan Goldberger** posted on Facebook: “Where people like Yitzhak Shamir, may he rest in peace, still be found?³⁷² Gaza demands its due. Instead of lodging Nazi murderers there[,] it should house settlements, cities, Kibbutzim, a park in memory of the victims, agriculture, yeshivas, schools, and kindergartens. House glory instead of ashes there.”³⁷³ On 19 November 2023 he posted, “Imagine a beautiful world[.] Less sad than it is. And we flatten Gaza to pieces[.] And above rooftops, only stars and the hostages return home [.] And we are going to rebuild Gaza as paradise. Imagine a bit of happiness[.] Because it is so so rare here. A city that was built out of darkness and we are all in joy . . . Imagine us avenging all the crimes of Gaza. . . Imagine a new Gaza, a city of inspiration. Imagine a beautiful world, less sad than it is[.] And we are on the beach walking, with sun in our pockets[.] (Imagine a beautiful world, a city out of darkness)[.] A simple world, imagine a revenge of happiness”.³⁷⁴
- On 6 November 2023, **Israeli soldiers were filmed singing with Israeli popular singer ‘Narkis’** a song with the lyrics: “We are finishing off Gaza! [Returning] Gush Katif! We are light unto the nations!”.³⁷⁵
- On 17 November 2023, **Givati Brigade Special Operations Unit Officer, Shlomi Warmstein**, advocated on his Facebook page for the destruction and settlement of Gaza, stating: “Summary: Returning to settle Gaza, today! . . . each one in his rank and position, all united as one fist for the war to destroy Gaza. There are no questions here, only a joint and united desire to erase this terrible evil and wickedness that we ignored for years . . . [We are] walking around the ruined streets, in houses, schools and hotels and looking to see the open sea at every opportunity, which grants a momentary view, pure and profound, of clean nature . . . They could have established a place of sea and tourism and life and

³⁶⁹ Lt. Col. Yonti Bahat, Facebook, 28 April 2024, https://www.facebook.com/permalink.php?story_fbid=pfbid093WwtjgHgZ61SoAXjiHwSvn9YdgCi6DccKvT4Rmke4z29vavC65CKi5tjBXQb23wl&id=100008349870884&locale=he_IL, also available at Younis Tirawi, @ytirawi, Tweet (10:23 pm, 13 July 2024), <https://x.com/ytirawi/status/1812221320035455192>.

³⁷⁰ Lt. Col. Shauli Sanker, Facebook (2 September 2024), <https://www.facebook.com/shauli.sanker.1/posts/pfbid02JyWRcG7jjUB48nmBN1vThLpqJR9A3hSgxVGrtTzzMbyF1AwnBSPCs7sWC4ZBXrXul>.

³⁷¹ Lt. Col. Shauli Sanker, Facebook (18 August 2024), <https://www.facebook.com/shauli.sanker.1/posts/pfbid02udr8GyH5ABRgQN3TX7x7YTWRuZYnUGdPnifozAFBsxVR4Nd78hiSNH2UT21Y4ohl>.

³⁷² See e.g., the late Yitzhak Shamir (previous Likud Chairman and Prime Minister of Israel)’s positions on Gaza: “Conference for the victory of Israel - settlement brings security. Building the Nation”, *STV-Live* (28 January 2024), <https://www.youtube.com/watch?v=SVKhg1M6LY4>, [1:12:03 - 1:12:05]: Yitzhak Shamir speaking to a younger Benjamin Netanyahu (now-Prime Minister) and Shimon Peres, saying: “Gaza is a part of Israel!” in Israeli television footage shown during the January 2024 Settlement Conference in Israel.

³⁷³ Maj. Dan Goldberger, Facebook (29 October 2023), https://www.facebook.com/permalink.php?story_fbid=pfbid02nWPcBpG1uLqVf5MUxyFsRT4nDJraPGb33JUMmkJnECqBds5YkNzamkqETQZx6x8l&id=100020588880209, also available at Younis Tirawi, @ytirawi, Tweet (8:56 pm, 1 June 2024), <https://x.com/ytirawi/status/1796979176991256943>.

³⁷⁴ Maj. Dan Goldberger, Facebook (19 November 2023), https://www.facebook.com/permalink.php?story_fbid=pfbid034SFPeNYc1HFSfadsDFtvh5cvCDeGRSa9jk2NjsanLBQ5ZjqFS9rwAiaPfXGJ1NXSl&id=100020588880209.

³⁷⁵ Middle East Eye, @MiddleEastEye, Tweet (2:11 am, 6 November 2023), <https://x.com/MiddleEastEye/status/1721319417248661648>.

residence and advanced agriculture, and business centres, literally a global centre, but they chose evil and death. There is nothing left in the places we walk through, G-d willing. Everything is broken and destroyed, courtesy of the Air Force and the Armored Corps . . . A pleasure to behold . . . Turns out that returning to Gush Katif is an apology. It is settling for less. And we are done apologizing! Gush Katif was originally established [out of] a security concept fortifying the [Gaza] Strip (see Haggai Hoberman, *ibid.*, *ibid.*) and we depleted our defenses. Now. Everything must be ours. For real. Everything is empty here and there is no reason in the world that we let them return. . . . Gaza must be a light upon the nations, this is truly an opportunity to be a light upon the nations. . . . A light that establishes an area of rare beauty, with sea, and tourism, agriculture and business centers, tourism and lots of settlement . . . Gaza must be . . . a light that shows that sometimes you have to be the most aggressive and the most determined and eliminate [as in ‘kill’] and take revenge and evict . . . For all the places we didn’t conquer. . . How beautiful it will be, if we make a decision, [we] wipe out, eliminate and destroy all the houses in Gaza, and build and rehabilitate the Envelope settlements, and in a long human chain, we will wait on the day of their return with flags and with a smile and a look that we’ve destroyed the enemy and now it is safe and everything is calm forever and we can sleep peacefully at night and live a peaceful life during the day”.³⁷⁶

- On 14 January 2024 a video was posted of **Israeli soldiers from the 9208th Battalion, under the command of Ysrael Ben Basloe**, in front of destroyed Palestinian properties, stating: “We, Battalion 9208 under the command of Israel Ben Pazi, will not stop [and] will continue until we complete the mission we received. [We] occupy, banish, settle. [We] occupy and banish and settle . . .”.³⁷⁷
- On 8 March 2024, **Sheila Sharal, a reservist in Company C, 271st Combat Engineering Battalion**, stated that we “want and expect that the whole Land of Israel will be ours without any other people anywhere in its territory, as appears in several places in the Torah. How important it is that we know what our vision is and what our ambition is on the way to complete redemption — the complete Land of Israel [Greater Israel], and above all — Jerusalem, the Temple Mount and the Temple”.³⁷⁸
- In December 2024, an **Israeli soldier** circulated footage of destroyed homes and neighbourhoods, stating: “We are here forever, until victory, until settlement. There’s no Jabalia, it’s over”.³⁷⁹

32. Reflecting statements by senior Israeli Governmental officials that the resettlement of Gaza is a question of “historical justice” and “morality” and “is the Torah”,³⁸⁰ Israeli soldiers serving in Gaza — some of whom are themselves settlers living in illegal settlements in the occupied West Bank, or have attended pre-military academies in such settlements³⁸¹ — openly assert that the resettlement of Gaza is the ultimate objective of Israel’s military campaign. Israeli soldiers photograph themselves in Gaza with signs such as: “Here will be built the settlements of Gush

³⁷⁶ Younis Tirawi, @ytirawi, Tweet (1:41 pm, 10 May 2024), <https://x.com/ytirawi/status/1788897079642689855>.

³⁷⁷ Khaled Yousry, @Khaledyousry22, Instagram (14 November 2023), <https://www.instagram.com/p/CzmtR2YKqdU/>.

³⁷⁸ Dvir Amar, “Shilo Sarel, a reserve platoon commander: In every house — the Golden Dome or Al-Aqsa Mosque”, *Israel National News* (8 March 2024), <https://www.inn.co.il/news/631442>.

³⁷⁹ B.M. @ireallyhateyou, Tweet (12:47 am, 22 December 2024), <https://x.com/ireallyhateyou/status/1870617232855670873>.

³⁸⁰ “Speech of Itamar Ben-Gvir”, *Jewish Power* (28 January 2024), <https://www.youtube.com/watch?v=MmGUIYpanqs>.

³⁸¹ See *e.g.*, the Bnei David Yeshiva in the settlement of Eli, Israel Prime Minister’s Office, *PM Netanyahu to the Students of the Bnei David Institutions in Eli: “The testament of the fallen is our mission – total victory”* (30 January 2024), <https://www.gov.il/en/departments/news/event-visit300124>. See Tamar Pileggi, “Embracing racism, rabbis at pre-army yeshiva laud Hitler, urge enslaving Arabs”, *The Times of Israel* (30 April 2019), <https://www.timesofisrael.com/embracing-racism-rabbis-at-pre-army-yeshiva-laud-hitler-urge-enslaving-arabs/>.

Katif [a former Israeli settlement in Gaza]”³⁸² and post pictures of destroyed Gazan neighbourhoods, stating: “the Israel flag is flying again at the settlement of Katif, on whose ruins the neighbourhood was built. We will return there again”.³⁸³ Israeli soldiers in Gaza openly declare “we will be back”³⁸⁴ and “dream” of “resettle[ing] Gush Katif” or “open[ing] up a [tattoo] studio in Khan Younis”,³⁸⁵ stating “it will take much faster than you think. Return to Gush Katif. . . [A]fter 18 years . . . we are returning to Netzarim [another former Israeli settlement in Gaza]”.³⁸⁶

Israel’s Rewarding of Soldiers Engaging in Genocidal Rhetoric and Soldiers’ Impunity

33. There are limited — if any — serious repercussions for Israeli soldiers engaged in genocidal acts, genocidal incitement, or other criminality in Gaza. Investigations into the conduct of its military have either not taken place, including in relation to specific incidents to which Israel was expressly alerted, or, where such investigations have taken place, they have not resulted in any effective or credible measures.

34. Out of some 80 investigation cases opened against soldiers, only 15 indictments were filed concerning violations committed in the context of Israel’s military operations since October 2023, and “most concern theft and arms trading, and none pertain to incidents causing death of a detainee”.³⁸⁷ One other incident has gained notoriety as the publicity surrounding it forced Israel to acknowledge it and to act upon it: despite prior complaints, it took the broadcast on Israeli media of crimes committed, including the sexual assault of a Palestinian detainee from Gaza at Sde Teiman detention camp,³⁸⁸ for nine soldiers from that facility to be detained. Subsequently, four were released from custody; the remaining five are being investigated not to prevent systematic abuse but because “there are countries for which the question of whether they sell and supply us with munitions is [determined by] whether we investigate when we receive a complaint” and the “independence” of investigations is “essential to the state’s arguments in international tribunals”.³⁸⁹ There is no indication at this point that criminal charges have been brought, nor that the investigation is conducted in good faith, competently and effectively. The domestic political opposition to these arrests amply demonstrated the widespread political aspiration to the continued impunity of Israeli soldiers.³⁹⁰

³⁸² Younis Tirawi, @ytirawi, Tweet (5:57 pm, 23 March 2024), <https://twitter.com/ytirawi/status/1771566936985403635>.

³⁸³ Avihai Shorshan, @a_shorshan, Tweet (9:08 pm, 12 March 2024),

https://twitter.com/a_shorshan/status/1767628818653593949, also available at <https://archive.ph/iSBnz>.

³⁸⁴ Hallel Bitton Rosen, @BittonRosen, Tweet (2:20 pm, 11 April 2024), <https://twitter.com/BittonRosen/status/1778397827351101919>.

³⁸⁵ Younis Tirawi, @ytirawi, Tweet (6:49 pm, 25 March 2024), <https://twitter.com/ytirawi/status/1772304727457317039>.

³⁸⁶ Younis Tirawi, @ytirawi, Tweet (12:16 am, 21 April 2024), <https://twitter.com/ytirawi/status/1781809245312180237>.

³⁸⁷ Bar Peleg, Hagar Shezaf, *Haaretz Exposé | 15 Indictments Filed Against Soldiers During Gaza War – None for Cases Involving Deaths of Security Detainees* (25 November 2024), <https://www.haaretz.com/israel-news/2024-11-25/ty-article/.premium/15-indictments-filed-against-soldiers-in-gaza-war-none-for-security-detainees-deaths/00000193-603e-d199-af9b-76fe7d1d0000>: “Sources in the military are criticizing the military advocate general for handing indictments for relatively light offenses but refraining from making a decision in serious cases where prisoners were killed and detainees suffered violent treatment due to worries of public criticism.”

³⁸⁸ Faisal Ali, “Israeli media airs footage showing alleged sexual abuse of Palestinian detainee – video”, *The Guardian* (8 August 2024), <https://www.theguardian.com/world/video/2024/aug/08/israeli-media-alleged-sexual-abuse-palestinian-detainee-video>.

³⁸⁹ Sam Sokol, “Military AG: Arresting officers at Sde Teiman wore masks as they face ‘dozens of threats’”, *The Times of Israel* (11 August 2024), <https://www.timesofisrael.com/military-ag-arresting-officers-at-sde-teiman-wore-masks-as-they-face-dozens-of-threats/>; Yossi Yehoshua and Tova Zimuky, “Legal officials: Suspicion against detained soldiers are serious, better that we investigate and not The Hague”, *Ynet* (29 July 2024), <https://www.ynetnews.com/article/hysvdrvya>: “Mistreatment of detainees could cause unprecedented international damage that we will not be able to face, and the internal investigations protect Israel from the Hague Tribunal. If we do not investigate, we are buying the political and military elite a ticket to the Tribunal and severe measures against them and against the State of Israel.”

³⁹⁰ See statements in Annex I pertaining to the arrests related to the rape at Sde Teiman. See also Josh Breiner and Bar Peleg, “Israeli Soldiers Attacked Military Police at Gunpoint for Arresting Comrades Over Sde Teiman Abuse”, *Haaretz* (15 October 2024), <https://www.haaretz.com/israel-news/2024-10-15/ty-article/.premium/idf-soldiers-attacked-military-police-at-gunpoint-for-arresting-comrades-at-sde-teiman/00000192-904d-d2db-ab97-dddd31dd0000>: “IDF reservists with ‘Force 100’ assaulted military cops coming to arrest other soldiers suspected of attacking and sexually abusing a Gazan detainee. The claim wasn’t investigated, as IDF police are avoiding the inquiry due to right-wing pressure, a source says.”

35. One other Israeli soldier was arrested on 25 May 2024, having filmed himself in Gaza, pledging allegiance to the Israeli Prime Minister, as against Israeli Defence Minister Yoav Gallant, warning that if the army does not “go all the way to victory, 100,000 reservists will stay on the [Gaza] fence [area] . . . We want victory. We want decisive [victory]. We want to take apart whoever’s left here. Everyone who celebrated when we were slaughtered. All the little children who stepped on the heads of our brothers. The soldiers, when they stepped on the land of Gaza. All of them, we want to kill. No one will stay alive”.³⁹¹ Despite clearly inciting genocide, he was reportedly charged with the unrelated charge of rioting and disobeying orders.³⁹² There is no indication of actual prosecution and/or punishment of the individual concerned, or any investigation in respect of his incitement to genocide.

36. Other soldiers have not been sanctioned or removed for their behaviour. Some, including officers heavily involved in the implementation of genocidal acts in Gaza, have instead been rewarded for their acts and statements, demonstrating the Israeli military’s further creation of a climate of impunity. Both military and political figures have rewarded such officers. By way of illustrative examples:

- On 11 March 2024, **Major General Yaron Finkelman**,³⁹³ in relation to **Brigadier General Barak Hiram’s** orders to level Israa University in Gaza, did not impose criminal sanction on Brigadier General Hiram but provided him with only a ‘command’ citation, *not for the demolition itself*, but because “he made this decision independently without adhering to the established chain of command”.³⁹⁴ The Major General stated that if Brigadier General Hiram had “submitted the request to collapse the university for . . . approval”, it would have been approved.³⁹⁵
- On 2 May 2024, it was announced that **Minister of Defense of Israel, Yoav Gallant, and the Chief of the General Staff, Lieutenant General Herzl Halevi** “decided to promote commanders who excelled in combat on the ground and at headquarters during the ‘Swords of Iron’ War to positions in the General Staff Forum”.³⁹⁶ Among those rewarded are **Brigadier General Dan Golfuss** — who oversaw the devastation of Khan Younis in December 2023³⁹⁷ — with the Brigadier General promoted to Major General in Israel’s General Staff Forum, and Commander of the Northern Corps and Head of the Manoeuvre Array in the

³⁹¹ Originally shared by the Prime Minister’s son Yair Netanyahu on his telegram account <https://t.me/yairnetan/11492>, also available with subtitles at Tali, @TalulaSha, Tweet (2:53 am, 25 May 2024), <https://x.com/TalulaSha/status/1794169860337111316> (Part I) and at Tali, @TalulaSha, Tweet (2:53 am, 25 May 2024), <https://x.com/TalulaSha/status/1794169863612842394> (Part II). See also Josh Breiner and Bar Peleg, “PM Netanyahu’s Son Shares Video of Alleged IDF Reservist Threatening Military Coup in Gaza”, *Haaretz* (25 May 2024), <https://www.haaretz.com/israel-news/2024-05-25/ty-article/.premium/pm-netanyahus-son-shares-clip-of-apparent-idf-reservist-threatening-military-coup-in-gaza/0000018f-af39-d24f-a5df-ffffd6180000>.

³⁹² Doron Kadosh, @Doron_Kadosh, Tweet (1:45 pm, 26 May 2024), https://x.com/Doron_Kadosh/status/1794696347607556336; “IDF reservist charged with insurrection for calling soldiers to disobey orders”, *i24 News* (26 May 2024), <https://www.i24news.tv/en/news/israel-at-war/artc-idf-reservist-charged-with-insurrection-for-calling-soldiers-to-disobey-orders>.

³⁹³ See also Younis Tirawi, @ytirawi, Tweet (1:14 pm, 6 January 2025), <https://x.com/ytirawi/status/1876240832438677528>; Younis Tirawi, @ytirawi, Tweet (1:18 pm, 6 January 2025), <https://x.com/ytirawi/status/1876242055321796921>. Also available at “The destruction of the ‘Officer’s Neighborhood’ in Beit Hanoun | Noam Amir with the details”, *Channel 14* (5 January 2025), <https://www.youtube.com/watch?v=7dcCvT28A6Q>.

³⁹⁴ Elisha Ben Kimon, “IDF Gaza Division commander reprimanded for blowing up Gaza university”, *Ynet News* (11 March 2024), <https://www.ynetnews.com/article/blr65v2ap>.

³⁹⁵ Emanuel Fabian, “Senior IDF officer censured over demolition of Gaza university without approval”, *The Times of Israel* (11 March 2024), <https://www.timesofisrael.com/senior-idf-officer-censured-over-demolition-of-gaza-university-without-approval/>.

³⁹⁶ IDF, *Announcement Regarding New Appointments to the General Staff Forum* (2 May 2024), <https://www.idf.il/en/mini-sites/israel-at-war/briefings-by-idf-spokesperson-rear-admiral-daniel-hagari/april-24-press-briefings/announcement-regarding-new-appointments-to-the-general-staff-forum/>, also available at <https://archive.ph/fEyB6>.

³⁹⁷ Amir Bohbot, “The IDF entered the depths of the tunnels in the south of the Gaza Strip, and Sinwar’s clock is ticking backwards”, *Walla* (26 December 2023), <https://news.walla.co.il/item/3631276>.

Israeli Ground Forces. **Brigadier General David ('Dado') Bar Kalifa** — who directed soldiers under his command to “pulverize every accursed plot of land”³⁹⁸ in Gaza and subsequently oversaw the complete destruction of Gaza neighbourhood of Shuja'iya in 2023³⁹⁹ — was also promoted to Major General in Israel's General Staff Forum.⁴⁰⁰

- On 27 October 2024, an Israeli soldier and illegal settler in the West Bank, **Staff Sergeant (res.) Shuvael Ben-Natan**, who died during combat in Southern Lebanon, was eulogised by his friends and family as having “entered Gaza to take revenge — as many women, children [as] you can, everyone you saw, his is what you wanted”.⁴⁰¹ They stated: “[y]ou were the happiest, most optimistic, and most mischievous person in the unit. We first met in Gaza, when you burned a house without permission just for the atmosphere.”⁴⁰² He was posthumously promoted by the Israeli military to the rank of Sergeant First Class.⁴⁰³

37. Similarly, Israeli army reservist Ezra Yachin — a 95-year-old veteran of the 1948 Deir Yassin massacre of the Nakba,⁴⁰⁴ who is employed by the Army to give “motivational speeches” to Israeli soldiers as they prepared for the ground invasion of Gaza in October 2023 (and subsequently⁴⁰⁵), urging the soldiers to “Hurt them as much as possible, so their memory will be erased. So not them, not their mother, not their child or their babies — they shouldn't be allowed to live, these animals”⁴⁰⁶ — was presented with a certificate of thanks and commendation by Israeli President Herzog on 6 March 2024.⁴⁰⁷ In his speech at the award ceremony, President Herzog told Ezra Yachin and the other senior recipients of the reward that they “have been a tremendous personal example for generations of Israeli citizens and the whole world”.⁴⁰⁸ Ezra Yachin was also invited to be one of the torch-lighters and speakers at the Israeli national torch-lighting ceremony of 13 May 2024, commemorating Israel's founding, at which Israeli Prime Minister Benjamin Netanyahu gave a speech.⁴⁰⁹ Similarly, after South Africa again raised concerns in its second oral

³⁹⁸ See above at para. 5.

³⁹⁹ “Documentation: Fighters of the 13th Fleet raided Gaza from the sea”, *Ynet* (27 October 2023), <https://www.ynet.co.il/news/article/r1o4kqkfa>.

⁴⁰⁰ IDF, *Announcement Regarding New Appointments to the General Staff Forum* (2 May 2024), <https://www.idf.il/en/minisites/israel-at-war/briefings-by-idf-spokesperson-rear-admiral-daniel-hagari/april-24-press-briefings/announcement-regarding-new-appointments-to-the-general-staff-forum/>, also available at <https://archive.ph/fEyB6>.

⁴⁰¹ @theno_o, Instagram (25 October 2024), https://www.instagram.com/reel/DBi_Qctt3XN/. See also “Reservist eulogized for desire to take revenge against Gazans, setting home on fire to ‘boost morale’”, *The Times of Israel* (27 October 2024), https://www.timesofisrael.com/liveblog_entry/reservist-eulogized-for-desire-to-take-revenge-against-gazans-setting-home-on-fire-to-boost-morale/; “‘You Entered Gaza to Take Revenge’: Mourners Eulogize IDF Soldier, West Bank Settler”, *Haaretz* (27 October 2024), <https://www.haaretz.com/israel-news/2024-10-27/ty-article/.premium/you-entered-gaza-to-take-revenge-mourners-eulogize-idf-soldier-west-bank-settler/00000192-ce38-df2b-a5db-ce3cf8340000>.

⁴⁰² *Ibid.*

⁴⁰³ IDF, *Sergeant First Class (res.) Shuvael Ben-Natan*, <https://www.idf.il/%D7%A0%D7%95%D7%A4%D7%9C%D7%99%D7%9D/%D7%97%D7%9C%D7%9C%D7%99-%D7%94%D7%9E%D7%9C%D7%97%D7%9E%D7%94/%D7%A9%D7%95%D7%91%D7%90%D7%9C-%D7%91%D7%9F-%D7%A0%D7%AA%D7%9F/>

⁴⁰⁴ United Nations, Question of Palestine, *UN Palestine Commission — Attack on Deir Yassin (9 April 1948) — Letter from United Kingdom* (20 April 1948), <https://www.un.org/unispal/document/auto-insert-211346/>.

⁴⁰⁵ @Torat_IDF, Tweet (7:40 pm, 1 January 2024), https://x.com/Torat_IDF/status/1741892216610509068/photo/1; Yosef Garmon, @RabinoGarmon, Tweet (4:14 pm, 16 January 2024), <https://x.com/RabinoGarmon/status/1746913800698098112/video/1>.

⁴⁰⁶ Bazz News, @1717Bazz, Tweet (8:39 pm, 11 October 2023), <https://twitter.com/1717Bazz/status/1712176168823107986>, also available at Middle East Eye, @MiddleEastEye, Tweet (9:48 pm, 13 October 2023), <https://twitter.com/MiddleEastEye/status/1712918166437806294>.

⁴⁰⁷ Isaac Herzog, @Isaac_Herzog, Tweet (3:05 pm, 6 March 2024), https://twitter.com/Isaac_Herzog/status/1765378196449501227.

⁴⁰⁸ *Ibid.*

⁴⁰⁹ “Netanyahu: [I] promise — we will continue until the end. Ohana: Israel was not in 7/10 as we expected it to be”, *Ynet* (13 May 2024), <https://www.ynet.co.il/news/article/r1nxkj1xr>; Elana Kirsh and Joshua Davidovich, “May 13: ‘Torch-dousing’ ceremony, rally for hostages counter state independence confab”, *The Times of Israel* (13 May 2024), https://www.timesofisrael.com/liveblog_entry/oldest-active-idf-reservist-95-lights-independence-day-torch-the-people-of-israel-are-eternal/; Sam Sokol, “With subdued state ceremony, Israel begins marking a somber 76th Independence Day”, *The Times of Israel* (14 May 2024), <https://www.timesofisrael.com/with-subdued-state-ceremony-israel-begins-marking-a-somber-76th-independence-day/>.

submissions to the Court on 16 May 2024,⁴¹⁰ Ezra Yachin was promoted to Chief Warrant Officer in a special ceremony by the Israeli army — the highest rank amongst non-commissioned officers.⁴¹¹ During this ceremony “it was said that he comes mainly to give the fighters motivation and to tell them, in the face of the disturbances caused by the Arabs, that also this time we will win”.⁴¹² He is thus still actively and extensively lecturing and inciting soldiers, with the content of these lectures well known to Israel.⁴¹³ Media reported that “[m]orning, noon and evening Yachin goes around with excitement and fiery speeches among the tens of thousands of soldiers and breathes in them an old-new spirit”.⁴¹⁴ Now-Chief Warrant Officer Ezra Yachin himself stated: “Everywhere I appear in front of soldiers, and I have been to several bases, everyone listens and receives me enthusiastically because they know me from my lectures and books. The soldiers carry me on their hands. I touch them. I make it clear to them that they should be careful because our enemy is very cunning and cruel, that they should be alert when they go to war and that they should succeed to hurt them”.⁴¹⁵ Such rewards on behalf of the Israeli army and other Organs of the State lead to one inference: that multiple Israeli officials agree with Chief Warrant Officer Yachin’s statements, and adopt his statements by providing him with official, State-sanctioned awards and promotions. His incitement had in fact inspired soldiers: on 11 October 2023, in response to Yachin’s speech,⁴¹⁶ a soldier on X stated: “Ezra Yachin prepares us for battle! Such power, such Zionism, such fervor [literally: poison. Hebrew slang for fervor, especially for battle]. We promise you Ezra, Elnakam! [lit: ‘vengeance of god’ or ‘god of vengeance’⁴¹⁷]”.⁴¹⁸ His continued employment and promotion by the Israeli military for the purpose of lecturing soldiers, and the continued promotions and accolades he receives by other members of the State, show their general agreement with his genocidal incitement and intent.

Required Urgent Action

38. The evidence of genocidal intent towards Palestinians in Gaza on the part of Israeli soldiers of all ranks in the Israeli military is incontrovertible from their statements, just as it is from their actions on the ground in Gaza. It demands the urgent intervention by the international community to prevent further acts of genocide and to protect the Palestinian people in Gaza from further harm, death and destruction.

⁴¹⁰ *South Africa v. Israel, Verbatim record 2024/27* (16 May 2024) <https://www.icj-cij.org/sites/default/files/case-related/192/192-20240516-ora-01-00-bi.pdf>, p. 47, paras. 21-22.

⁴¹¹ Dvir Amar “At the age of 96: Ezra Yachin was promoted to the rank of reserve Chief Warrant Officer”, *Channel 7* (20 June 2024), <https://www.inn.co.il/news/640924>.

⁴¹² *Ibid.*

⁴¹³ *Ibid.* See also “Beacon of the Spirit: Ezra Yachin moved, Iris Haim a tear”, *Srugim* (13 May 2024), [https://www.srugim.co.il/931630-%D7%9E%D7%A9%D7%95%D7%90%D7%AA-%D7%94%D7%A8%D7%95%D7%97-%D7%A2%D7%96%D7%A8%D7%90-%D7%99%D7%9B%D7%99%D7%9F-%D7%A8%D7%99%D7%92%D7%A9-%D7%90%D7%99%D7%A8%D7%99%D7%A1-%D7%97%D7%99%D7%99%D7%9D-%D7%93: “95-year-old Ezra Yachin lit a beacon as well. \[Ezra Yachin\] is the eldest reserve soldier who gives talks to soldiers to this day”](https://www.srugim.co.il/931630-%D7%9E%D7%A9%D7%95%D7%90%D7%AA-%D7%94%D7%A8%D7%95%D7%97-%D7%A2%D7%96%D7%A8%D7%90-%D7%99%D7%9B%D7%99%D7%9F-%D7%A8%D7%99%D7%92%D7%A9-%D7%90%D7%99%D7%A8%D7%99%D7%A1-%D7%97%D7%99%D7%99%D7%9D-%D7%93: “95-year-old Ezra Yachin lit a beacon as well. [Ezra Yachin] is the eldest reserve soldier who gives talks to soldiers to this day”).

⁴¹⁴ Dvir Amar “At the age of 96: Ezra Yachin was promoted to the rank of reserve Chief Warrant Officer”, *Channel 7* (20 June 2024), <https://www.inn.co.il/news/640924>.

⁴¹⁵ *Ibid.*

⁴¹⁶ Judeoespañol, @Judeoespanol, Tweet (6:54 pm, 11 October 2024), <https://x.com/Judeoespanol/status/1712149619298259264/photo/1>.

⁴¹⁷ Translators note: Elnakam was Ezra Yachin’s nickname from his time in the Stern Gang, a Jewish paramilitary organization active during the British Mandate in Palestine and known for acts of violence against Palestinians it carried out.

⁴¹⁸ Eitan, @Dr_eitant, Tweet (6:05 pm, 11 October 2024), https://x.com/Dr_eitant/status/1712137384035225803.

ANNEX III

INCITEMENT TO GENOCIDE

1. Article III(c) of the Genocide Convention requires States to punish “direct and public incitement to commit genocide”. Article IV of the Genocide Convention makes clear that “persons committing” direct and public incitement to genocide “shall be punished, whether they are constitutionally responsible rulers, public officials or private individuals”.¹ And Article V of the Genocide Convention further underscores the obligation binding on State Parties to provide “effective penalties” in relation to such incitement.² Article 25(3)(e) of the Rome Statute of the International Criminal Court (‘ICC’) provides that “a person shall be criminally responsible and liable for punishment for a crime within the jurisdiction of the Court if that person . . . directly and publicly incites others to commit genocide”.³ Crimes of incitement to genocide are within the jurisdiction of the ICC and give rise to an obligation on State parties to the Rome Statute to exercise their criminal jurisdiction over such crimes⁴ — in light of the universal jurisdiction of States over the crime of genocide and related acts⁵ — and to cooperate fully with the Court in its investigation and prosecution of crimes.⁶

2. Israel is moreover required under the third provisional measure of the Order of 26 January 2024 (‘January Order’) of the International Court of Justice (‘ICJ’), reaffirmed in its orders of 28 March 2024 (‘March Order’) and 24 May 2024 (‘May Order’), to “take all measures within its power to prevent and punish the direct and public incitement to commit genocide”.⁷ The requirement to “punish” the direct and public incitement to genocide requires Israel to investigate, prosecute and punish those responsible for public incitement to genocide, regardless of their status, rank or role. The requirement that Israel “prevent” direct and public incitement to commit genocide requires Israel to take all measures to prevent and deter such incitement, such as through warnings and sanctions — including against prominent members of the public who influence the public discourse in Israel.

3. The below non-exhaustive collection of publicly available statements evidences the extensive dehumanisation of Palestinians by public figures in Israel and in the public discourse,⁸ their incitement to violating the baseline humanitarian principles

¹ Convention on the Prevention and Punishment of the Crime of Genocide (adopted 9 December 1948, entered into force 12 January 1951), 78 UNTS 277, Art. IV.

² Convention on the Prevention and Punishment of the Crime of Genocide (adopted 9 December 1948, entered into force 12 January 1951), 78 UNTS 277, Art. V.

³ Rome Statute of the International Criminal Court (adopted 17 July 1998, entered into force 1 July 2002), 2187 UNTS 90, art 25(3)(e).

⁴ Rome Statute of the International Criminal Court (adopted 17 July 1998, entered into force 1 July 2002), 2187 UNTS 90, Art. 86.

⁵ See e.g., *Prosecutor v Ntuyahaga*, Decision on the Prosecutor’s Motion to Withdraw the Indictment, Trial Chamber I (18 March 1999) IT-98-40-T, <https://ucr.irmct.org/LegalRef/CMSDocStore/Public/English/Transcript/NotIndexable/ICTR-98-40/TRS19274R0000631156.PDF>, p. 10; *Attorney-General v Eichmann* (Israeli Supreme Court, 29 May 1962) 36 ILR 277, para. 12.

⁶ Rome Statute of the International Criminal Court (adopted 17 July 1998, entered into force 1 July 2002), 2187 UNTS 90, Art. 86.

⁷ *Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (South Africa v. Israel)*, Order of 26 January 2024, <https://www.icj-cij.org/sites/default/files/case-related/192/192-20240126-ord-01-00-en.pdf>, p. 25, para. 86(3).

⁸ See e.g. Committee on the Elimination of Racial Discrimination (‘CERD’), *Decision on follow-up to the declaration on the prevention of genocide: indicators of patterns of systematic and massive racial discrimination*, CERD/C/67/1 (14 October 2005), https://www.ohchr.org/sites/default/files/Documents/Press/indicators_for_genocide.pdf, and e.g., UN News, “Genocide begins with ‘dehumanization;’ no single country is immune from risk, warns UN official” (9 December 2014), <https://news.un.org/en/story/2014/12/485822>. See also *Prosecutor’s Office of Bosnia and Herzegovina v. Milorad Trbić*, Court of Bosnia and Herzegovina, First Instance Verdict (29 April 2010), X-KR-07/368, https://www.worldcourts.com/wcsbih/eng/decisions/2009.10.16_Prosecutor_v_Trbic.htm, para. 794 (‘Ordinary men are capable of committing the most extraordinary evil given the right set of circumstances. It is the product of unexamined and unchecked hatred.’) and para. 796 (‘What after all does it take? Perhaps unlike murder it takes a more complete indifference to a portion of humanity. The perpetrator must have the ability to forget that a specific portion of the population, of one’s larger community, is human. It takes a consuming indifference to the fate of a member of this group. The very notion of indifference here goes beyond hate. Hate implies a relationship, something many in this particular conflict had with neighbors, colleagues, in-laws and schoolmates. But these relationships were also destroyed by the dehumanisation that some, not all, embraced. While many resisted what they knew to be false, many did not and fell victim themselves to this propaganda. But once a person loses his humanity to indifference, genocide becomes the means to the end.’).

of the law of armed conflict with respect to Palestinians, and their incitement to genocide — including incitement involving calls for Palestinians' extermination; the total destruction of Gaza; the deprivation of conditions of life essential to the survival of Palestinians (including through the shuttering of UNRWA); and the mass expulsion of Palestinians from Gaza and its subsequent Jewish settlement.

4. None of those statements has resulted in any criminal indictments under Israeli law for their utterers.⁹

Incitement to Genocide by Israeli Civic Leaders

5. Prominent Israeli personalities — including former Ministers, current and former ambassadors and politicians, and local and municipal officials — routinely use their public platforms to make dehumanising statements about Palestinians, argue against the application of baseline humanitarian principles of the law of armed conflict for Palestinians, and incite the genocide of Palestinians in Gaza:

- **Former Likud Party MK and former Deputy Speaker of the Knesset, Moshe Feiglin** has repeatedly called for the destruction of Palestinians as a group. On 10 October 2024, in a televised news interview on Channel 14, he stated: “Not one stone left standing on another in Gaza! Gaza turns into Dresden, yes. Total incineration. All hope is lost! All the rules are gone. The landlord has gone crazy, however you [want to] call it . . . the Air Force used ‘roof knocking’ tonight before toppling a wretched tower near Shifa Hospital — instead of flattening all of Gaza and declaring to the whole world that what once was will be no more. . . Destroy Gaza now! Now!”¹⁰ On 12 October 2023, he tweeted on X that: “When Gantz and Netanyahu say the goal is ‘the elimination of Hamas’ what they are saying is that IDF soldiers will be sent to conquer Gaza, in order to hand it over to Abu Mazen. In Oslo [the Oslo Accords] we handed over Gaza to Arafat. And now we will shed our sons’ blood to conquer Gaza for Abu Mazen — his successor . . . It is not Hamas that needs to be eliminated. Gaza must be flattened and Israeli rule restored. This is our country.”¹¹ He also repeated his calls in a subsequent interview on Channel 14 that day stating that “if the goal of this operation is not destruction, occupation, deportation and settlement, we’ve done nothing”.¹²
- On 12 October 2023, **Amir Weitman, Head of the Libertarian Caucus, Likud Party**, commented in a radio interview that, “‘We are in exceptional circumstances that allow us to empty the Gaza Strip, abolish the Strip, transfer the residents to Egypt and make the Strip a part of Israel’. . . For this to happen, he says, [Israel] must ‘flatten all buildings in the Strip, as General Eiland proposed.’ . . . ‘We are at a historic crossroads. Only in the [1967] Six-Day War did we have the opportunity to empty the strip, but because of the clumsiness of those in power, it was not done. These are moves that can only be made in times of crisis and not in times of routine. If we don't do it in the next few weeks we will lose the opportunity and we won't be able to do it’”.¹³

⁹ See para. 31 below.

¹⁰ “A Firestorm Should Wash Over Gaza, Now! – Moshe Feiglin In [Channel] 14 Studio”, *Moshe Feiglin* (10 October 2023), <https://www.youtube.com/watch?v=5yPjMy9G-Fo>.

¹¹ Moshe Feiglin, @moshefeiglin, Tweet (7:16 am, 12 October 2023), <https://x.com/moshefeiglin/status/1712336429982846977>, also available at: Yehuda Shaul, @YehudaShaul, Tweet (5:27 pm, 17 October 2023), <https://twitter.com/YehudaShaul/status/1714301999703814288/photo/>.

¹² Channel 14, @Now14Israel, Tweet (11:02 pm, 12 October 2023), <https://x.com/Now14Israel/status/1712574501802643846>; also available at Yehuda Shaul, @YehudaShaul, Tweet (5:27 pm, 12 October 2023), <https://twitter.com/YehudaShaul/status/1714301995002020296/photo/1>.

¹³ Shimon Cohen. “The Plan for Transferring the Gazan Population to Egypt”, *Artuz 7* (12 October 2023), <https://www.inn.co.il/news/616371>; “A Rare Opportunity. Amir Weitmann”, *Arutz 7 Podcast* (12 October 2023), <https://omny.fm/shows/arutzsheva/055a0319-a940-43e5-8e9b-b09900b97657>.

- On 14 October 2023, **Tzipi Navon, former adviser to Sara Netanyahu** — spouse of the Prime Minister of Israel, called for the eradication of Gaza on her Facebook account in Hebrew and stated “we keep saying flatten Gaza, flatten Gaza, I think it’s not enough.”¹⁴
- On 16 October 2023, **Tzipi Hotovely, Ambassador of Israel to the United Kingdom**, in a televised interview, stated: “When you [the UK] fight Nazi Germany, you knew that there are many many civilians [that] got attacked . . . all together it was over 600,000 civilian Germans who got killed and was it worth it in order to defeat Nazi Germany? And the answer was yes.”¹⁵
- On 17 October 2023, **Omer Bar-Lev, Former Israeli Minister of National Security**, in a ‘tweet’, called for a “complete siege on Gaza. No water, no electricity, no food. Like on Beirut 1982. Water to the south of the Gaza Strip — only in exchange for the return of the kidnapped children and women. A broad humanitarian move only in exchange for the return of all the hostages. We must not give up even if Biden applies pressure.”¹⁶
- **Arieh King, the Deputy Mayor of Jerusalem**, has repeatedly dehumanised and incited genocide against Palestinians. On 17 October 2023, King stated that “[i]f PM@Netanyahu or his Ministers from the State of Israel cared, there would have been 150,000 dead already in the Gaza Strip and not a single building in the [Gaza] Strip would be left standing.”¹⁷ On 11 November 2023, he called to “wipe out and erase the terrorism cities from which those who massacred our brothers came out.”¹⁸ In December 2023 he commented on a picture of Palestinian men and boys being held almost completely naked, and blindfolded, in sand ditches in Gaza, saying: “@idfonline is exterminating the Muslim Nazis in Gaza. [They] must pick up the pace. If I was the decision maker, I would rush in 4 D-9, set them up behind the dirt hills and give the order to cover all these hundreds of Nazis, while they are still alive. They are not humans and not human animals, they are sub-human should be treated as such. Wipe out the memory of Amalek [Exodus 17:14], we will not forget. [referring to the commandment to Remember Deuteronomy 25:17 T,N.]”¹⁹
- On 19 October 2023, **Naftali Bennett, former Prime Minister of Israel**, tweeted: “The truth must be told: Most of Gaza’s residents support Hamas, and many of them enthusiastically support the murder of innocent Jews . . . The majority of the Gazan public supports Hamas and its [chosen] path of destroying Israel. The murderous terror organization Hamas does not exist on ‘dry land’ ... Friends, Hamas hinges on broad support from the residents of Gaza. Without this support, Hamas could not exist. That’s the bitter reality. The conclusion

¹⁴ “Sarah Netanyahu's advisor is spreading poison against leftists: ‘the traitors continue to incite’”, *Ynet* (14 October 2023), <https://www.ynet.co.il/news/article/rjscwxbt>, also available at Middle East Eye, “‘Save their tongues for last’: Adviser to Sara Netanyahu calls for torture”, *Middle East Eye* (14 October 2023), <https://www.middleeasteye.net/live-update/save-their-tongues-last-advisor-sara-netanyahu-calls-torture>.

¹⁵ “‘You Can’t Deny There’s a Humanitarian Crisis!’ Piers Morgan Debates Israeli Ambassador On Gaza”, *Piers Morgan Uncensored* (17 October 2023), <https://www.youtube.com/watch?v=d8x3EXfdD0Y> [9:30-9:51]; also available at Saul Staniforth, @SaulStaniforth, Tweet (10:12 pm, 16 October 2024), <https://x.com/SaulStaniforth/status/1714011361716433264>.

¹⁶ Omer Bar-Lev, @omerbarlev, Tweet (6:38 pm, 17 October 2023) <https://twitter.com/omerbarlev/status/1714320023328600461>.

¹⁷ Original deleted (Arieh King, @ariehking, Tweet (9:36 pm, 17 October 2023)); also available at Yehuda Shaul, @YehudaShaul, Tweet (5:23 pm, 11 November 2024), <https://x.com/YehudaShaul/status/1723375953244504193>.

¹⁸ Arieh King, @ariehking, Tweet (7:48 pm, 11 October 2023), https://x.com/arieh_king/status/1711982206749425842; also available at Yehuda Shaul, @yehudashaul, Tweet (4:23 pm, 11 November 2023), <https://x.com/YehudaShaul/status/1723375973016457693>.

¹⁹ “Israeli official calls for burying alive ‘subhuman’ Palestinian civilians”, *Middle East Eye* (8 December 2023), <https://www.middleeasteye.net/live-blog/live-blog-update/israeli-municipality-official-calls-burying-alive-subhuman-palestinian>. Original deleted (AriehKing, @ariehking, Tweet, https://x.com/arieh_king/status/1733014554714501153); also available at Daniel Seidemann, @DanielSeidemann, Tweet (11:27 am, 8 December 2023), <https://x.com/DanielSeidemann/status/1733055773343621529>.

should not be that Israel will seek to harm civilians intentionally. That is not our way. But we must not lie to ourselves. The truth must be told.”²⁰

- On 25 October 2023, **Dan Gillerman, Israel’s former Permanent Representative to the United Nations and former Director of Israel’s central bank**,²¹ stated in an interview on Sky News that he was “very puzzled by the constant concern which the world and also Britain. . . is showing for the Palestinian people and is actually showing for these horrible inhuman animals who have done the worst atrocities that this century has seen and the worst atrocities the Jews have suffered since the Holocaust”.²²
- On 26 October 2023, **Moshe Feiglin, Former Likud Party MK and former Deputy Speaker of the Knesset**, commented on a podcast that the “terrible” sights in Gaza were “not terrible enough. We need much more” including “[m]uch, much more. Much more [dead babies]”.²³
- On 1 November 2023, **Michael Ben-Ari, former MK and co-founder of Otzma Yehudit Party, and avowed disciple of Rabbi Meir Kahane**, tweeted: “What does demilitarizing mean? [that] Arabs will remain in Gaza who will massacre our soldiers. ‘The Lebanese mud’ [a Hebrew expression describing the first Israel-Lebanon War] once more? If a single Arab remains in Gaza, we have been defeated! Simcha [Rothman, an MK from the Religious Zionism party, who called for demilitarizing Gaza] don’t bring defeat upon us”.²⁴
- On 8 November 2023, **Ayelet Shaked, former Israeli Minister of the Interior and Minister of Justice**, was quoted in Israeli newspaper Israel Hayom as stating: “the Gaza Strip needs to shrink significantly”.²⁵ Two weeks later, on 22 November 2023, she explained in an interview on Israel television Channel 13 that: “With God and the IDF’s help, we will turn Khan Younis into a soccer field too. I’m sure there will be international pressure at some point . . . And then we need to take advantage of that. To take advantage of the destruction . . . the countries of the world, that each one should take a quota, it can be 20,000 or 50,000, [so] that they too will shoulder the burden so that we will allow them to leave. You have to understand, it was hard for them to leave until now, it was complicated to leave Gaza. We need to change our outlook and let them leave. We need to let them leave. As Zvika said before, in the last few years half a million young people emigrated. We need two million to emigrate. In all honesty, that’s the solution for Gaza.”²⁶
- On 9 November 2023, **former Minister of Communications and former Blue and White (Kahol Lavan) Party MK, Yoaz Hendel**, stated in an opinion editorial on the Israel Hayom news website that “[w]e will certainly tear apart the [Gaza] strip, bisect it, if that’s what’s needed for total security. This is a war

²⁰ Former Prime Minister of Israel, Naftali Bennett, @naftalibennett, Tweet (9:37 pm, 19 October 2023), <https://twitter.com/naftalibennett/status/1715089771368780108>.

²¹ UN Meetings Coverage and Press, *New Permanent Representative of Israel Presents Credentials* (15 January 2003), <https://press.un.org/en/2003/bio3471.doc.htm>.

²² Sky News, @SkyNews, Tweet (10:37 pm, 25 October 2023), <https://twitter.com/SkyNews/status/1717279204130037806>.

²³ “Moshe Feiglin: war, morality, the gospel of Judaism, antisemitism, and the disintegration of the vision of the sanctuary Daniel Dushy’s podcast”, *Daniel Dushy’s podcast* (26 October 2023), <https://www.youtube.com/watch?v=nzThmnP7qA4&t=3836s>, also available at B.M., @ireallyhateyou, Tweet (7:35 pm, 16 June 2024), <https://x.com/ireallyhateyou/status/1802394554164768886>.

²⁴ Michael Ben-Ari, @drmichaelbenari, Tweet (9:43 pm, 1 November 2023), <https://twitter.com/drmichaelbenari/status/1719802481037709554>.

²⁵ “Ayelet Shaked: Hezbollah Should be Attacked, Even Now if They are on the Border”, *BHOL* (8 November 2023), <https://www.bhol.co.il/news/1615149>.

²⁶ Younis Tirawi, @ytirawi, Tweet (11:47 am, 22 November 2023), <https://twitter.com/ytirawi/status/1727262445033386230>.

of no choice. Every military step we take will be made because there are no other choices.”²⁷

- On 17 December 2023, **David Azoulai, head of the Metula Council** — the Council of a town in the North of Israel — in a radio interview with Ben Caspit and Yinon Magal stated that Israel should “establish a security strip from the river to the fence, that will be completely empty, so that everyone will remember what used to be there. Flatten everything the way Auschwitz is today . . . Tell all of Gaza to go to the beaches, and load all the terrorists there on to Navy ships, put them on the beaches of Lebanon, and the entire Strip will be empty, completely flattened, exactly like Auschwitz. There should be a museum, so that the entire world will learn what the state of Israel can do and that no one will live in the Gaza Strip, they will be made an example of.”²⁸
- On 22 December 2023 a video was published of Daniella Weiss, founder of Nachala, an Israeli settler organization, and a former mayor of illegal Israeli settlement Kedumim in the occupied West Bank, stating that “as [the army] worked in the north [of Gaza], it needs to work in the south and to leave Gaza to non-Arabs and to establish a Jewish settlement across Gaza. As they say in the neighbouring settlements that want to see the sea. That is, in order to see the sea, it is necessary that there are no homes. There will be no homes, there will be no Arabs...the idea is a Jewish Gaza... there will be no more possibility for Arabs of any kind to rule Gaza. It’s over.”²⁹
- On 29 December 2023, **Michael Ben-Ari, former MK and co-founder of Otzma Yehudit Party, and avowed disciple of Rabbi Meir Kahane**, was filmed stating “Our enemy is not Hamas, it is not the rockets. Our enemy is the Arabs in Gaza. As long as there are Arabs in Gaza the State of Israel is threatened. To eliminate Hamas is to eliminate Gaza, not to kill them, to send them around the world . . . Remember the sentence: there is no Gaza and us; it’s either Gaza or us. This is humanitarian”.³⁰
- On 3 January 2024, **Tzipi Hotovely, Ambassador of Israel to the United Kingdom**, in a television interview said: “every school, mosque and every second house has an access to tunnels.” The presenter asked: “but that’s an argument for destroying the whole of Gaza?”. Tzipi Hotovely responded: “do you have another solution?”³¹
- On 4 January 2024, during a discussion in the Israeli parliament, **Noga Arbell, a researcher with the Kohélet Policy Forum and former official of the Israeli foreign ministry**,³² declared that, “we know how to eliminate terrorists, it is more difficult for us with an idea. UNRWA is the source of the idea. It gives birth to more and more terrorists in all kinds of methods. And it will be

²⁷ Yoaz Hendel, “When Jewish Children Are Murdered: There Is No Other Option But To Destroy Hamas”, *Israel Hayom* (9 November 2023), <https://www.israelhayom.co.il/news/politics/article/14806698>.

²⁸ “A completely flattened Strip is needed, exactly like in Auschwitz”, *103FM* (17 December 2023), <https://103fm.maariv.co.il/programs/media.aspx?ZrqvnVq=JGJIGI&c41t4nzVQ=FJF>. Also available at “Israel should make Gaza look like Auschwitz museum - council head”, *The Jerusalem Post* (17 December 2023), <https://www.jpost.com/israel-hamas-war/article-778367>.

²⁹ “Erase Gaza so settlers can see the sea’: Head of Israeli settlement movement”, *Middle East Eye* (22 December 2023), <https://www.youtube.com/watch?v=uGbKujNp9vM>.

³⁰ “Former Knesset member says Gazans must be forced out of Gaza for Israel’s survival”, *Middle East Monitor* (29 December 2023), <https://www.middleeastmonitor.com/20231229-former-knesset-member-says-gazans-must-be-forced-out-of-gaza-for-israels-survival/>.

³¹ Hamza Yusuf, @Hamza_a96, Tweet (9:44 pm, 3 January 2024), https://twitter.com/Hamza_a96/status/1742632994609750425.

³² Israel, The Knesset, *Subcommittee for Foreign Policy and Public Diplomacy discusses UNRWA's activity during Swords of Iron war; MK Elkin, chair: "Very alarming details revealed about use of UNRWA for Hamas terror"* (7 January 2024), <https://main.knesset.gov.il/EN/News/PressReleases/Pages/press7124q.aspx>, see also Etgar Lefkovitz, “Israeli lawmakers ponder UNRWA overhaul”, *JNS* (9 January 2024), <https://www.jns.org/israeli-lawmakers-ponder-unrwa-overhaul/>.

impossible to win the war if we don't destroy UNRWA, and this destruction must begin immediately. It is irrelevant talking about the day after. The day is now, and we must act to remove the threats completely, or we will miss this opportunity – and as was mentioned here, we had already [missed] several times... let's remember that it operates here, in the territories Israel conquered in 1967, by Israel's request to do so, that is what brought them in here. Israel can ask it now to stop. And at the same time, to object to the refugee status it grants very very generously [to Palestinians]. Because for a refugee, there are international criteria. UNRWA's status certifications cannot be passed [to a different organization], they must be cancelled. Sinfully conceived, they need to be thrown away. Whoever deserves one [a refugee status], should go and check with the UNCHR if they really deserves it.”³³

- On 6 January 2024, as reported by Middle East Monitor, **former Ambassador of Israel to Italy, Dror Eydar**, stated on Israeli news Channel 14 that: “The price they must pay for what they've done to us, should not be limited to merely punishing the killing of insurgents. We are not talking about a conflict imposed on us, that's illogical. We refer to them as ‘territories’, while they call them ‘land’ [adamah] from which the word ‘human’ [adam] is derived. In the Middle East, it means that a man without land is worth nothing and has no right to exist. Therefore, the price they must pay for it to impact future generations is that we must take their land. First, we must take land, after we have taken their land, we will think about what we'll do next. The second thing we need to push for, despite all voices and opinions, is new emigration and helping them find a new life... Gaza is certainly now destroyed and not suitable for human habitat. And I expect the Western world, as they did by welcoming a million Syrian refugees, to open their doors and welcome the people of Gaza”.³⁴
- On 1 February 2024, in a media interview, **Daniella Weiss, founder of Nachala, an Israeli settler organization, and a former mayor of illegal Israeli settlement Kedumim in the occupied West Bank**, stated: “[n]o Arab will remain in Gaza. The Arabs have finished this chapter . . . October 7th opened a new chapter in the history of the Middle East and the world. Hamas absolutely cannot stay, Hamas supporters absolutely cannot stay. Those who want a quiet life should live a quiet life in Canada, Scotland, Egypt, Turkey. . .”³⁵
- On 2 February 2024, **Ayelet Shaked, former Israeli Minister of the Interior and Minister of Justice**, wrote an opinion editorial in Israeli newspaper *Ynet* with the title “An opportunity to close UNRWA”, in which she stated that, “[t]he fact that the organization became a military and political asset for the Palestinian terrorist organizations should pull the rug out from under the feeble argument that a humanitarian catastrophe among Palestinians and specifically in Gaza should be prevented,” and that “UNRWA is built on the residents of Gaza and the residents of Gaza are for the most part activists or supportive of terrorist organizations. This organization has no advantage for Israel.”³⁶

³³ Middle East Eye, @MiddleEastEye, Tweet (7:42 am, 28 January 2024), <https://x.com/MiddleEastEye/status/1751480836682399772>.

³⁴ “Former Israeli Ambassador calls on the Western world to take the Gazan population”, *Middle East Monitor* (6 January 2024), <https://www.middleeastmonitor.com/20240106-former-israeli-ambassador-calls-on-the-western-world-to-take-the-gazan-population/>; also available at <https://vod.now14.co.il/player/episode/6596dffe5579b60017f6fa0c> [28:36].

³⁵ Interview with Daniella Weiss on Israeli media site ‘Relevant’, 1 February 2024; Middle East Eye, @middleeasteye, Instagram Post (2 February 2024), <https://www.instagram.com/reel/C22nWaAoYeX>; also available at https://x.com/relevant_il/status/1753098541957046391.

³⁶ Middle East Eye, @MiddleEastEye, Tweet (7:42 am, 28 January 2024), <https://x.com/MiddleEastEye/status/1751480836682399772>.

- On 14 February 2024, **former MK and Head of Eshkol Regional Council, Haim Jelin**,³⁷ stated to Israeli news website Mako, that “[t]here are no more non-involved [people] in the Gaza Strip. The data they gave me is completely incorrect. Everyone is involved there, including the homes of the civilians.”³⁸
- On 3 May 2024, only days prior to the Rafah invasion, **Shimon Boker, the Vice Chair of the international arm of the Likud Party**, stated on Israeli Channel 12: “I think we needed to invade Rafah yesterday. To go in and to . . . to go in and kill . . . There are no uninvolved . . . [We] need to go in and kill and kill and kill . . . we need to kill them before they kill us.”³⁹
- On 6 May 2024, **Arieh King**, the Deputy Mayor of Jerusalem, called for the obstruction of humanitarian aid to Gaza on X, stating that “The aid trucks for the Muslim Nazis in Gaza are on their way now (21:35) to the French Hill intersection. Help the fighters of Tsav-9 [a group dedicated to stopping humanitarian aid trucks] and join them at the French Hill Junction.”⁴⁰ A few hours later, on the same day, he tweeted, “Jews! Right now on Route 1 the aid convoy for the Muslim Nazi enemy is on its way to the Gaza Strip to help those who raped our nation's daughters, kidnapped our brothers and soldiers. Jews, rise and wake up! The convoy is now near Mevaseret Zion and on its way to Sha'ar HaGai and Latrun. Come to Route 1 and stop the disgrace. Don't let the enemy aid convoy to reach the enemy.”⁴¹
- On 16 June 2024, on Channel 12 News, Former Likud Party MK and former Deputy Speaker of the Knesset, **Moshe Feiglin** affirmed that settlement required the destruction of the Palestinians in Gaza, referring to the Holocaust and stating: “As Hitler said, ‘I can’t live in this world if there is one Jew left in it’. We will not be able to live in this land if one such ‘Islam-Nazi’ is left in Gaza.”⁴² In or around August 2024, he made the following statements: “You gave them human rights, you afforded them the protection of the law instead of killing them [unintelligible]. They shouldn't have even got here. They should all have been food for pigs a long time ago, that is the fate [literally: Din, the word for Jewish law] of these Amalekites. So they won't see their 70 virgins. No human rights!”⁴³
- On 1 July 2024, **Yehuda Vald, general director of the Religious Zionism Party**, stated: “Director of Shifa hospital. Should face the same judgement as the Nazi doctor Mengele. Death.”⁴⁴
- On 12 August 2024, **Daniella Weiss**, founder of Nachala, an Israeli settler organization, and a former mayor of illegal Israeli settlement Kedumim in the occupied West Bank, in an interview stated that, “[t]he moment Netanyahu said that there would be a long-term military presence in Gaza. I said ‘this is it. This is an invitation to the dance’. ‘I’ll stay and you will use the expertise. I call this

³⁷ Hebrew: Haim Yellin.

³⁸ “‘There Are No More Uninvolved In The Gaza Strip, Everyone Is Involved. These Are Not Our Neighbours Anymore’”, *Mako News* (14 February 2024), <https://www.mako.co.il/tv-morning-news/articles/Article-4975b67be66ad81027.htm>.

³⁹ “Ofira and Levison”, *Channel 12* (3 May 2024), https://www.mako.co.il/mako-vod-keshet/ofira_levinson-2024/VOD-3cc2a2319283f81027.htm, also available at B.M., @ireallyhateyou, Tweet (4:50 pm, 6 May 2024), <https://twitter.com/ireallyhateyou/status/1787495113578491967>.

⁴⁰ Arieh King, @arieh_king, Tweet (8:37 pm, 6 May 2024), https://x.com/arieh_king/status/1787552209195970829.

⁴¹ Arieh King, @arieh_king, Tweet (10:20 pm, 6 May 2024), https://x.com/arieh_king/status/1787578086352896274.

⁴² “Former Israeli MK Quotes Hitler While Discussing Gaza War”, *Haaretz* (16 June 2024), <https://www.haaretz.com/israel-news/2024-06-16/ty-article/former-israeli-mk-quotes-hitler-while-discussing-gaza-war/00000190-224f-d231-a1b2-e65f76fe0000>; also available at B.M., @ireallyhateyou, Tweet (10:20 pm, 16 June 2024), <https://x.com/ireallyhateyou/status/1802435990251848148>.

⁴³ David Sheen, @davidsheen, Tweet (10:01, 28 August 2024), <https://x.com/davidsheen/status/1828704377336451556>.

⁴⁴ B.M., @ireallyhateyou, Tweet (3:21 am, 2 July 2024), <https://x.com/ireallyhateyou/status/1807947718309851513>.

‘copy/paste’ as what we did in the West Bank.”⁴⁵ On 18 September 2024, she featured in a documentary showing Israeli citizens enjoying a boat trip to the sea of Gaza — with a view of Gaza being bombarded. She explained: “[t]he purpose of the settlement groups is to get as close as possible to Gaza, to fully see Gaza, and to realize that from now on, Gaza will be entirely Jewish!”⁴⁶

- On 18 August 2024, former **Michael Ben-Ari**, former MK and co-founder of Otzma Yehudit Party, and avowed disciple of Rabbi Meir Kahane, replied to a post on X writing: “[a]nd therefore Gaza must be erased. There will be no Kfar Aza unless we erase Gaza! Ram Ben Barak [MK from Yesh Atid who advocated the resettlement of the Palestinian population of Gaza throughout the world] was right!”⁴⁷
- 6. Several religious leaders in Israel have also made dehumanising statements against Palestinians and incited genocide against them:
 - On 8 March 2024, **Rabbi Eliyahu Mali, head of the Shirat Moshe yeshiva in Jaffa**,⁴⁸ speaking at a conference at the yeshiva — graduates of which are currently serving in the Israeli army⁴⁹ — invoked Biblical references to “the holy war”⁵⁰ in the context of Israel’s military activities in Gaza. He stated:

“The basic commandment we have when fighting in the holy war, in this case in Gaza, [is] according to the doctrine ‘you shall not let a soul remain alive.’ [Deuteronomy 20:16]. And the logic of this is very clear. If you don’t kill them, they will [attempt to] kill you. Today’s saboteurs are the children of the previous wars who we kept alive. And in reality it is the women who create the terrorists. What this means is that this principle of ‘do not spare any soul’ is very clear in our conception. It’s either you or them. The [principle of] ‘you shall not let a soul remain alive’ is based on ‘he who comes to kill you, rise and kill him first.’ And he who comes to kill you, here, in the broad sense, is not only the man who is 14, 16, 20, 30, who points his weapon at you. But also the next generation, and those who create the next generation. Because there really is no difference.”⁵¹

- When questioned about the killing of elderly Palestinians and children in Gaza, Rabbi Mali gave the following response:

“There is a difference between civilian population in other places, to the civilian population in Gaza. In Gaza, according to estimates, 95 to 98 percent [of the population] wish for our destruction. . . You can’t be clever with the Torah. Today he is a baby, tomorrow he is a fighter. There’s no questions here. The terrorists of today were 8-year-old children in the previous military operation. So you can’t settle [for less] here. Which is why the verdict for Gaza is different here.”⁵²

⁴⁵ Younis Tirawi, @YounisTirawi, Tweet (3:16 pm, 12 August 2024), <https://x.com/ytirawi/status/1822985520290341360>; Younis Tirawi, @YounisTirawi, Tweet (2:36 pm, 12 August 2024), <https://x.com/ytirawi/status/182297556233225289>.

⁴⁶ “TRT World Exclusive: Holy Redemption: Stealing Palestinian Land”, *TRT World* (18 September 2024), https://www.youtube.com/watch?v=mF6B5UVupyA&ab_channel=TRTWorld, [51:50].

⁴⁷ B.M., @ireallyhateyou, Tweet (7:07 pm, 24 August 2024), <https://x.com/ireallyhateyou/status/1827392212797149486/photo/1>.

⁴⁸ “Israeli rabbi says ‘kill everyone in Gaza, including babies’”, *The Cradle* (8 March 2024), <https://thecradle.co/articles-id/23810>; see Hesder Yeshiva, <https://www.yafo.org.il/en>.

⁴⁹ “Head of the Seder yeshiva in Jaffa: according to the halachic principle - kill everyone in Gaza, even babies”, *Ynet* (8 March 2024), <https://www.ynet.co.il/news/article/sy3bfhu6p>. See Hesder Yeshiva, <https://www.yafo.org.il/en>.

⁵⁰ Deuteronomy 20:16, Sefaria (JPS 1985), https://www.sefaria.org/Deuteronomy.20.16?lang=bi&vside=Tanakh:_The_Holy_Scriptures,_published_by_JPS|en&with=Translation%20Open&lang2=en.

⁵¹ “‘Not a single soul will live’: The head of the yeshiva stirs up a storm”, *Bhol* (9 March 2024), <https://www.bhol.co.il/news/1655924>; also available at Palestine Info Center, @palinfoen, Tweet (11:38 am, 9 March 2024), <https://twitter.com/palinfoen/status/1766413166693454212>. See also “Head of the Seder yeshiva in Jaffa: according to the halachic principle - kill everyone in Gaza, even babies”, *Ynet* (8 March 2024), <https://www.ynet.co.il/news/article/sy3bfhu6p>.

⁵² *Ibid.*

- On 6 August 2024, **Rabbi David Fendel, head of the Sderot Yeshiva**, in a video posted on YouTube, stated: “With God’s help, there is no reason in the world why we cannot live there . . . We cannot live next to Nazis; evil and their ideology must be eradicated. Bad ideas kill. Since it’s truly impossible to completely kill an idea, it’s either us or them, and that’s simple. We are ready; we are waiting for the right timing. You think, ‘Here, we’ll leave them; it will be excellent,’ but in the end, it doesn’t work out. It’s us or them — we prefer us. They have 22 Arab countries; they can go there, or to Europe, that’s fine. A solution is for them to find a new place — it’s a simple solution.”⁵³

Incitement to Genocide by Former Military and Intelligence Officials

7. Israeli former military and intelligence officials — including those who continue to serve in an advisory role to Israeli governmental officials — are routinely given a public platform to dehumanise Palestinians, advocate for non-compliance with the law of armed conflict *vis-à-vis* Palestinians, and incite genocide against Palestinians. By way of example:

- On 8 October 2023, **Former Head of the Israeli National Security Council and former National Security Advisor to Prime Minister Netanyahu, Ya’akov Amidror**, stated on Knesset TV that “the State of Israel should announce, in my opinion, that it will not enter negotiations and will not stop the military operation until all hostages are returned. If this means that we continue to bomb Gaza for the next three months, and slowly destroy Gaza — you must understand this is part of the process — then the Gazans will have to do their own calculations, whether this situation is good for them or not. So we have to impose a siege on Gaza, so that the supplies they need won’t be there, create pressure from within, and continue to bomb Gaza so that there will be severe damage to its infrastructure. . . in Gaza, the Gazans voted for Hamas, in free elections. So Gaza is Hamas, Hamas is Gaza. Therefore, our hand should rest easier on the trigger when it comes to the matter of hitting civilian infrastructures. Will this kind of operation succeed in bringing back the hostages? I don’t know, it is going to be a very complex manoeuvre.”⁵⁴
- On 10 October 2023, **former Commander of the Israeli Military’s Northern Command and former MK, Yossi Peled**, stated in a radio interview: “this time there’s nothing humanitarian. We must deliver such a blow, be determined and cruel. We have to take responsibility so that this country can exist. *We need to level Gaza*. If we do not know [how] to respond in a way that will restore the confidence of this nation in its leadership and the military, a big part [of the nation] will leave.”⁵⁵
- On 16 October 2023, **former Head of the Mossad (Israel’s national intelligence agency), Yossi Cohen**, stated to Israeli news channel Kann News, that “[c]urrently Gaza is under siege. If you’ve heard my statements on the matter, I said ‘don’t blink’ — I’ve seen the first blink [now] . . . Letting in water to the south of its area . . . If this was done due to international pressure, which doesn’t entirely understand that Gazan civilians — civilians, not just Hamas terrorists — went through the fence [on October 7th] you’ve seen them in the pictures, you’ve seen people [who were] completely unarmed, they didn’t have RPGs on their shoulder, they didn’t come on motorcycles, and maybe they did.

⁵³ “The Rabbi David Fendel, head of the Sderot Yeshiva [Talmudic college], strengthens Eli Aza”, *Eli Aza* (6 August 2024), <https://www.youtube.com/watch?v=kIJfjiolfMw>.

⁵⁴ Knesset TV, @KnessetT, Tweet (6:50 pm, 8 October 2023), <https://twitter.com/KnessetT/status/1711061487530225758>.

⁵⁵ “Major General Peled: ‘[To] Be Determined And Cruel – Our Existence Depends Upon It’”, *Galey Israel Radio* (10 October 2023), <https://www.gly.co.il/item?id=29883>. Also available at Nimer Sultany, @NimerSultany, Tweet (10:14 pm, 27 May 2024), <https://x.com/NimerSultany/status/1795186747669651770> and Nimer Sultany, @NimerSultany, Tweet (9:14 pm, 27 May 2024), <https://x.com/NimerSultany/status/1795186744343613557>.

[inaudible] and looting and participating in, according to the videos we have in our hands, participated in the deplorable murder of women and babies.”⁵⁶

- On 20 October 2023, **Meir Ben-Shabbat, Israel’s former National Security Advisor, former Head of the National Security Council, previous senior official in Israel’s Shin Bet and confidante of Benjamin Netanyahu**,⁵⁷ published an op-ed in the Israeli newspaper *Israel Hayom* advocating for Israel to “respond with overwhelming force, and let the chips fall where they may.” He wrote: “At the end of the battle in Mosul, the UN estimated that over 80% of the city, the second-largest in Iraq, was uninhabitable. A similar experience occurred in Raqqa, Syria, another stronghold of ISIS that was targeted by the U.S. military, which also ended with the label ‘unsuitable for human habitation.’ This is the real corollary that should come with the statement that ‘ Hamas is ISIS.’ . . . It’s time to dispel the myth that ‘the Gaza population is a victim of Hamas, which imposed itself on them.’ . . . Israel has no other choice. It must respond with overwhelming force, and let the chips fall where they may . . . Gaza’s humanitarian needs will not be Israel’s concern.”⁵⁸
- On 22 October 2023, **former counter-terrorism advisor to Israeli Prime Ministers Yitzhak Rabin and Yitzhak Shamir, and former head of the Israeli Civil Administration in the West Bank, Yigal Carmon**, emphasised Israel’s focus on bombing Gaza to completely destroy it, stating “Gaza will not be rebuilt in the next 20 year . . . Gaza as a centre of life will no longer exist. . . There will be no return of civilians to Gaza until Israel’s security is guaranteed, and there is no chance of that for at least the next twenty years”.⁵⁹ On 7 November 2023, he stated that “Gaza will be turned into piles of rubble in any case”, saying that “[i]f Hamas refuses such a deal . . . we have no choice but to bomb and then triple the bombing and turn Gaza to rubble. Every empty house should turn into rubble . . . Northern Gaza will become a war zone in the next decade . . . The south of the Gaza Strip will become one big refugee camp — like in Syria, like in Turkey, like in Jordan. Hundreds of thousands will live there . . . After Gaza City is wiped out, it and the north of the Gaza Strip will turn into [a place] like Normandy after World War II, within a decade or two. Gaza will be wiped off the face of the earth, because they will keep shooting at us and there will be no end to this war, and we will protect ourselves and protect ourselves fiercely.”⁶⁰
- On 29 October 2023, **former Deputy Commander of the Gaza Division of the Israeli army, Amir Avivi**, confirmed to the *Financial Times* newspaper that the Israeli army is “not taking any chances” in that “[w]hen our soldiers are manoeuvring we are doing this with massive artillery, with 50 aeroplanes overhead destroying anything that moves”.⁶¹

⁵⁶ Kalman Libskind, Assaf Liberman and Amihai Stein, “Former Head of The Mossad: No ‘Blinking’ In Siege, Except For Existential Needs”, *Kann News* (16 October 2023), <https://www.kan.org.il/content/kan-news/global/569875/>.

⁵⁷ “Bennett taps former senior Mossad official as his new national security adviser”, *The Times of Israel* (11 July 2021), https://www.timesofisrael.com/liveblog_entry/bennett-taps-former-senior-mossad-official-as-his-new-national-security-adviser/; Michael Hauser Tov, “Israel’s National Security Adviser Ben-Shabbat to Step Down in August”, *Haaretz* (1 July 2024), <https://www.haaretz.com/israel-news/2021-07-01/ty-article/.premium/israels-national-security-adviser-ben-shabbat-to-step-down-in-august/0000017f-e971-d62c-a1ff-fd7bfa510000>.

⁵⁸ Meir Ben Shabbat, “The only choice Israel has”, *Israel Hayom* (20 October 2023), <https://www.israelhayom.com/opinions/the-only-choice-israel-has/>.

⁵⁹ Yigal Carmon, “On The Future”, *Middle East Research Institute* (22 October 2023), <https://www.memri.org.il/cgi-webaxy/item?5946>.

⁶⁰ Dor Levintar, “Interview with Yigal Carmon: The South of Gaza Will Become One Giant Refugee Camp. The Rest Will Become A Memorial Site, Like Normandy. It Will Be A Closed Military Zone And The Fighting Will Not Cease”, *Epoch* (7 November 2023), <https://epoch.org.il/geopolitics/539329/>.

⁶¹ James Shotter, Neri Zilber, Mehul Srivastava and Andrew England, “The tactics behind Israel’s ground offensive”, *The Financial Times* (29 October 2023), <https://www.ft.com/content/92a31b6e-a5b7-4533-96ed-89d14e6c2b14>.

- On 1 December 2023, **Israel's former National Security Advisor, former Head of the National Security Council, previous senior official in Israel's Shin Bet and confidante of Benjamin Netanyahu, Meir Ben-Shabbat**,⁶² published an op-ed in the Israeli newspaper, *Israel Hayom*. In it he advocated for "a more aggressive approach" to Israel's military offensive in Gaza, arguing that "[t]he expectation that Israel allow humanitarian aid to Gaza (and even increase it) is based on two mistaken assumptions, in my opinion. The first is that the war is being conducted between Israel and the terrorist organization Hamas in a way that is unrelated to the 'State of Gaza.' The second is that there is a practical possibility in the Gaza Strip to separate between 'aid to Hamas' and 'aid to the population'." On that basis, he advocated for the continued severe restrictions on aid into Gaza.⁶³
- On 13 February 2024, **former Division Chief of the Hostages and Missing in Action Unit of Mossad (Israel's national intelligence agency), Rami Igra**, asserted that "there are no uninvolved in Gaza. There is no such thing . . . In Gaza everyone is involved. They all voted for Hamas. Anyone over the age of four is a Hamas supporter".⁶⁴
- On 20 March 2024, **Israeli army Brigadier General (Reserve) Jacob Nagel, former Head of Israel's National Security Council and former National Security Advisor to Prime Minister Benjamin Netanyahu**,⁶⁵ argued in a radio interview on Israel's 103FM that the only reason to ensure evacuations of Palestinians from Rafah was "so that we are not accused of killing" what the Brigadier General called "supposedly innocent civilians" in Gaza, so that Israel would not risk losing the support of its allies or the world.⁶⁶
- On 28 March 2024, **Major General (ret.) Moti Almoz, a former spokesperson of the Israeli army, former head of the Army's personnel directorate, and previously Head of Israel's 'civil administration' unit in COGAT**, in an interview on Israel's Army Radio Galei Tzahal labelled Palestinians in Gaza "human animals".⁶⁷
- On 18 April 2024, **former senior Shin Bet officer, Moshe Puzailov**, when interviewed on Israeli radio 103FM stated that "There is no such thing as uninvolved [people]" in Gaza. He asserted that "[t]he levels of hatred instilled from infancy [in Gazans] are such that no other reality can be produced other than true hatred and a desire to annihilate the Jews."⁶⁸
- On 22 June 2024, in a television interview, **Betty Lahat, Former head of the Israeli Prison Service's Intelligence System, ex-Assistant Commissioner**,

⁶² "Bennett taps former senior Mossad official as his new national security adviser", *The Times of Israel* (11 July 2021), https://www.timesofisrael.com/liveblog_entry/bennett-taps-former-senior-mossad-official-as-his-new-national-security-adviser/; Michael Hauser Tov, "Israel's National Security Adviser Ben-Shabbat to Step Down in August", *Haaretz* (1 July 2021), <https://www.haaretz.com/israel-news/2021-07-01/ty-article/.premium/israels-national-security-adviser-ben-shabbat-to-step-down-in-august/0000017f-e971-d62c-a1ff-fd7bfa510000>.

⁶³ Meir Ben Shabbat, "Generous humanitarian aid will only prolong the war", *Israel Hayom* (1 December 2023), <https://www.israelhayom.com/2023/12/01/generous-humanitarian-aid-will-only-prolong-the-war/>.

⁶⁴ "Seven with Ayala Hasson", *Kan News* (13 February 2024), [https://www.kan.org.il/content/kan/kan-actual/p-11039/703794/\[36:30\]-\[37:30\]](https://www.kan.org.il/content/kan/kan-actual/p-11039/703794/[36:30]-[37:30]). Also available at Middle East Eye, @MiddleEastEye, Tweet (5:29 am, 15 February 2024), <https://twitter.com/MiddleEastEye/status/1758000584135962846>.

⁶⁵ American Technion Society, *Faculty: Jacob Nagel*, <https://ats.org/about/faces-of-the-technion/jacob-nagel/>.

⁶⁶ "How will Israel evacuate 1.2 million Gazans from Rafah? IDF general explains", *The Jerusalem Post* (20 March 2024), <https://www.jpost.com/israel-hamas-war/article-792452>.

⁶⁷ Major General (res.) Moti Almoz in GLZ, @GLZRadio, Tweet (10:05 am, 28 March 2024), <https://twitter.com/GLZRadio/status/1773260052683469178>; also available at Younis Tirawi, @ytirawi, Tweet (28 March 2024), <https://twitter.com/ytirawi/status/1773350643366850738>.

⁶⁸ Former senior officer in the Shin Bet Moshe Puzailov on 103fm, Sivan Cohen Saban, @sivanhakolkalul, Tweet (4:18 pm, 18 April 2024), <https://twitter.com/sivanhakolkalul/status/1780964143236841665>.

stated: “[w]e should have given each one [of the Palestinians abductees from Gaza] a bullet in the head after he is interrogated . . . Instead of now starting to deal with how to treat them”.⁶⁹

8. Israeli Army (Retired) Major General,⁷⁰ Giora Eiland – former Head of the Israeli National Security Council,⁷¹ and sometime adviser to Israel’s Defence Minister, Yoav Gallant,⁷² has repeatedly engaged in genocidal rhetoric, and incitement to genocide against Palestinians. By way of example:

- On 7 October 2023, he wrote in online journal Fathom that “the only effective way to achieve” Israel’s “strategic goal” in Gaza was “to impose a dramatic, continuous, and strict siege over Gaza”. He stated that “[t]his is what Israel has begun to do — we cut the supply of energy, water and diesel to the Strip”, but argued that “it’s not enough. In order to make the siege effective, we have to prevent others from giving assistance to Gaza . . . The people should be told that they have two choices; to stay and to starve, or to leave. If Egypt and other countries prefer that these people will perish in Gaza, this is their choice.”⁷³ On the same day, he asserted in an Israeli newspaper that “[w]hen you are at war with another country you don’t feed them, you don’t provide them electricity or fuel or water or anything else. You create a full siege on that country. You can attack a country in a much broader way, so as to bring the country to the brink of dysfunction. This is the necessary outcome of [these] events” in Gaza.⁷⁴
- On 8 October 2023, he stated when asked about the continuation of fighting in Gaza that “[i]t isn’t our interest that Gaza will be rehabilitated, and that’s an important command which should be communicated to the Americans”,⁷⁵ and that “[i]f we ever want to see the hostages alive, the only way is to create a severe humanitarian crisis in Gaza.”⁷⁶
- On 9 October 2023, he continued to advocate for the targeting of water in Gaza, noting that water in Gaza “comes from wells with unfit brackish water. They have purification facilities. Israel should target all these facilities. And when the whole world says we’ve gone crazy and it’s a humanitarian disaster — we’ll say it’s a means [to an end]”.⁷⁷
- On 10 October 2023, he stated in an opinion editorial for an Israeli national newspaper that “the State of Israel has no choice but to make Gaza a place that is temporarily, or permanently, impossible to live in.”⁷⁸

⁶⁹ B.M., @ireallyhateyou, Tweet (1:40 pm, 22 June 2024), <https://x.com/ireallyhateyou/status/1804479518804963361>.

⁷⁰ “Ex-top general: IDF op against Hamas at Shifa Hospital inescapable; US must back it”, *The Times of Israel* (6 November 2023), https://www.timesofisrael.com/liveblog_entry/ex-top-general-idf-op-against-hamas-at-shifa-hospital-inescapable-us-must-back-it/.

⁷¹ “Former security officials and strategic advisor: the ‘cabinet’ established by Gallant for himself”, *Ynet* (26 October 2023), <https://www.ynet.co.il/news/article/r1zlenoga>.

⁷² “Ex-top general: IDF op against Hamas at Shifa Hospital inescapable; US must back it”, *The Times of Israel* (6 November 2023), https://www.timesofisrael.com/liveblog_entry/ex-top-general-idf-op-against-hamas-at-shifa-hospital-inescapable-us-must-back-it/.

⁷³ Giora Eiland, “Opinion | ‘A new turning point in the history of the State of Israel. Most people don’t understand that’”, *Fathom* (October 2023), <https://fathomjournal.org/opinion-a-new-turning-point-in-the-history-of-the-state-of-israel-most-people-dont-understand-that/>.

⁷⁴ Giora Eiland, “The state of Gaza opened war against Israel - and should be fought accordingly”, *N12* (7 October 2023), https://www.mako.co.il/news-columns/2023_q4/Article-fcf787ad0ba0b81027.htm.

⁷⁵ Interview with Giora Eiland on Kann News, 17 November 2023: Kann News, @kann_news, Tweet (8:42 pm, 17 November 2023), https://twitter.com/kann_news/status/1725585143333622129.

⁷⁶ Ariel Whitman, “Giora Eiland outlines plan to get hostages back alive”, *Globes* (8 October 2023), <https://en.globes.co.il/en/article-giora-eiland-outlines-plan-to-get-hostages-back-alive-1001459631>.

⁷⁷ Nadav Eyal, “How To React To A Massacre Of Hundreds”, *Yedioth Ahronoth* (9 October 2023), <https://drive.google.com/file/d/115Ow2T0Na20BcoL2yautiobj8ldNsVK/view>.

⁷⁸ Giora Eiland, “This is not revenge. It’s either us or them”, *Ynet* (10 October 2023), <https://www.ynet.co.il/yedioth/article/yokra13625377>.

- On 12 October 2023, again writing in a popular Israeli newspaper, he called for Israel “to create a humanitarian crisis in Gaza, compelling tens of thousands or even hundreds of thousands to seek refuge in Egypt or the Gulf.... The entire population of Gaza will either move to Egypt or move to the Gulf... Gaza will become a place where no human being can exist, and I say this as a means rather than an end. I say this because there is no other option for ensuring the security of the State of Israel.”⁷⁹ In a Times Radio interview on the same day, he reiterated that the Israeli army should:

“create such a huge pressure on Gaza, that Gaza will become an area where people cannot live. People cannot live, until Hamas is destroyed, which means that Israel not only stops to supply energy, diesel, water, food whatever as we did in the past twenty years . . . but we should prevent any other possible assistance by others, and to create in Gaza such a terrible, unbearable situation, that can last weeks and months. It is going to be a very, very long siege”.⁸⁰

- On 6 November 2023, in an interview with journalists from the Times of Israel newspaper, he stated that, “if there is an intention for a military action at Shifa [Hospital], which I think is inescapable . . . the US must ultimately back even an operation like this, even if there are thousands of bodies of civilians in the streets afterward.”⁸¹
- On 19 November 2023, in a newspaper article in Israeli newspaper Yedioth Ahronoth, echoing the words of President Herzog, he advocated for there being no distinction between Hamas combatants and Palestinian civilians, saying:

“who are these ‘miserable’ Gazan women? They are all the mothers, sisters or wives of Hamas murderers. On one hand they are part of the infrastructure supporting the organization, and on the other hand if they experience a humanitarian disaster, then we can assume that some of the Hamas warriors and junior commanders will begin to realize that the war is pointless . . . The international community warns us of a humanitarian disaster in Gaza and of severe plagues. We must not flinch in the face of this, as difficult as that may be. After all, severe plagues in the south of the [Gaza] Strip will hasten our victory . . . When senior Israeli officials say ‘it’s us or them’ to the press, the question of who is ‘them’ should be asked. ‘They’ are not only armed Hamas fighters but also the entire ‘civilian’ bureaucracy including hospital administrators and school principals, and yes, the entire Gazan population who enthusiastically supported Hamas and cheered on the horrific acts of October 7th.”⁸²
- On 2 January 2024, he asserted in the newspaper Israel Hayom that “humanitarian supplies into the Gaza Strip — flour and food” are “more problematic than weapons” as “it is actually flour and food that is really lacking there, so this is a significantly more powerful form of leverage”.⁸³

⁷⁹ Giora Eiland, “It’s time to rip off the Hamas band-aid”, *Ynet* (12 October 2023), <https://www.ynetnews.com/article/sju3uabba>.

⁸⁰ “How Israel plan to ‘destroy Hamas’ | Major General Giora Eiland”, *Times Radio* (12 October 2023), <https://www.youtube.com/watch?v=CRHz0dZwF2A> [00:00-00:49].

⁸¹ “Ex-top general: IDF op against Hamas at Shifa Hospital inescapable; US must back it”, *The Times of Israel* (6 November 2023), https://www.timesofisrael.com/liveblog_entry/ex-top-general-idf-op-against-hamas-at-shifa-hospital-inescapable-us-must-back-it/.

⁸² Giora Eiland, “Let’s not be intimidated by the world”, *Yedioth Ahronoth* (print) (19 November 2023), in Bezalel Smotrich, Minister of Finance, Chairman of the Religious Zionist Party, @bezalelsm, Tweet (1:20 pm, 19 November 2023), <https://twitter.com/bezalelsm/status/1726198721946480911>.

⁸³ Major General (ret.) Giora Eiland in Nadav Shragai, “What can Israel do with the Egypt-Gaza border?”, *Israel Hayom* (2 January 2024), <https://www.israelhayom.com/2024/02/01/what-can-israel-do-to-with-the-egypt-gaza-border/>.

- On 5 March 2024, as Palestinian children in Gaza were beginning to die of starvation, Israeli newspaper Maariv published an interview with Maj. Gen. (ret.) Giora Eiland in which he stated that “[i]f the Palestinians are crying out for humanitarian aid, the answer they should be told is, ‘You have a government, pressure it to reach a hostage deal if you really want food’. By increasing aid, we are passing down a death sentence in agony to the Israelis kidnapped in Gaza”.⁸⁴
- On 8 April 2024, in an interview with BBC Newsnight, he stated that “if we want to make sure that all . . . the Israeli hostages will be brought back, then the only way to guarantee is to create such a pressure that even the government of Hamas, that is not really so sensitive about the well-being of the people, will be under pressure of hundreds, thousands of Palestinians which are hungry, frustrated, angry and might rise against the regime. That's what happened in the Arab Spring exactly 13 years ago”.⁸⁵ He reiterated this call for a total siege on 17 April 2024, advising that “the state of Gaza does have vulnerabilities. It doesn't have sufficient fuel, food and water of its own. You can impose a legitimate boycott on that state until the state returns all of your hostages”.⁸⁶
- On 18 September 2024, Maj. Gen. (ret.) Eiland presented to the Knesset his plan (the “General's Plan”) which calls for the northern Gaza Strip to be placed under siege and transformed into a closed military zone.⁸⁷ On 22 September, before the start of Israel's siege on northern Gaza, the Prime Minister conveyed to lawmakers that he was considering the “General's Plan” to lay siege to northern Gaza.⁸⁸ Maj. Gen. (ret.) Eiland himself explained his plan as follows:

“The first phase is to let the people who already live there [in North Gaza] know, that they should leave this area and they should evacuate this area . . . to walk not a very long distance, it is only three or four miles to the Al Mawasi area — it is not a built up area, there are a lot of refugees there, there are a lot of tents there and they can join the other people who are there . . . If some of them face difficulties there are so many international organisations operating in Gaza with ambulances and all the other assets, that they can help the people to leave. Then after the people leave and again, we will give them a week, ten days, two weeks, whatever is necessary. After we give them such a chance to leave, then all this area by definition is going to be a military zone, because only the combatants of Hamas will stay there. And then we can tell those people who stay there, especially combatants that they have two choices, either to surrender and if not, we will stop to enable supply to enter this region. And when I am speaking about supplies, I am speaking about everything, food, fuel, water. By the way the water is supplied by Israel directly, the Israeli water system supplies this area as we do the other areas in Gaza. So we will stop all these supplies, and we will enforce a real military siege over this area. And the results will be surrender, or they will not be able to stay there. And if they cannot be there, either because they flee with the civilians, which is fine, or they surrender, when

⁸⁴ Major General (ret.) Giora Eiland in “Eiland reveals: the two critical mistakes that Israel makes in Gaza”, *Maariv* (5 March 2024), <https://www.maariv.co.il/news/military/Article-1081222>.

⁸⁵ Interview with Giora Eiland on BBC Newsnight (8 April 2024), <https://www.bbc.co.uk/iplayer/episode/m001y5k7/newsnight-police-unprotection> [33:00]-[33:36].

⁸⁶ David Horovitz, “A Top Ex-General's Radical Strategy for Tackling Iran, Saving the Hostages, Calming the North”, *The Times of Israel* (17 April 2024), <https://www.timesofisrael.com/a-top-ex-generals-radical-strategy-for-tackling-iran-saving-hostages-calming-the-north/>.

⁸⁷ Israel, Knesset, *Foreign Affairs and Defense Committee discusses "Generals' Plan" for Gaza; Maj.-Gen. (res.) Eiland: "It can change the reality"* (18 September 2024), <https://main.knesset.gov.il/en/news/pressreleases/pages/press18924r.aspx>.

⁸⁸ Sam Sokol, “Netanyahu tells lawmakers he's considering ‘Generals’ Plan’ to lay siege to northern Gaza”, *The Times of Israel* (22 September 2024), https://www.timesofisrael.com/liveblog_entry/netanyahu-tells-lawmakers-hes-considering-generals-plan-to-lay-siege-to-northern-gaza/.

they stay they will die of starvation, then we will easily be able to take this land, without the need to fight in a very populated area . . . we will simply be able to take this land.”⁸⁹ Eiland explains further “Had Hamas understood that not returning hostages means losing 35 percent of the Strip's territory, it would have compromised long ago”.⁹⁰

- It appears that the plan has indeed been implemented — in such a manner as to further exacerbate the death and destruction resulting from it.⁹¹

Incitement to Genocide by Israeli Journalists and Political Pundits

9. Journalists and political pundits routinely incite genocide against Palestinians, and do so without sanction or censure. Statements include calls for “a more painful opening blow” on Gaza, involving the killing of 100,000 Palestinians,⁹² for Palestinians to be “destroy[ed]”,⁹³ saying that “[w]e are coming to Gaza . . . Take into account how many of you we're going to kill, and how much we're going to carry out against you . . . I'm updating you that it's coming. Numbers that you never even imagined can be reached. . . we will come to exterminate you”,⁹⁴ and calling to “erase the Gaza Strip” as “They all deserve to die. Everyone. Revenge.”⁹⁵ These journalists and political pundits have faced no professional or criminal repercussions.⁹⁶

10. With impunity, **popular Israeli media personality and former politician,⁹⁷ Shimon Riklin**, has repeatedly incited genocide against Palestinians, including on his

⁸⁹ The Jewish Institute for National Security of America (‘JINSA’), *Watch Webinar – The ‘Generals’ Plan’ for Gaza* (21 October 2024), <https://jinsa.org/the-generals-plan-for-gaza/>.

⁹⁰ Giora Eiland, “Opinion | In Defense of the ‘Generals’ Plan’: Laying Siege to Israel's Enemy Isn't a War Crime”, *Haaretz* (1 November 2024), <https://www.haaretz.com/opinion/2024-11-01/ty-article-opinion/.premium/in-defense-of-the-generals-plan-laying-siege-to-israels-enemy-isnt-a-war-crime/00000192-e406-d2fe-affe-e76f2f410000>.

⁹¹ See *supra*. See also Idan Landay, “Exterminate, expel, resettle: Israel's endgame in northern Gaza”, *+972 Magazine* (1 November 2024), <https://www.972mag.com/extermine-expel-resettle-israel-northern-gaza/>; United Nations Geneva, @UNGeneva, Tweet (5:00 pm, 28 October 2024), <https://x.com/UNGeneva/status/1850915671229481161>; UN OCHA, *Acting UN relief chief: 'Disregard for humanity must stop' in North Gaza* (26 October 2024), <https://www.ochaopt.org/content/acting-un-relief-chief-disregard-humanity-must-stop-north-gaza>; UN OCHA, *Statement on Gaza by Joyce Msuya, Acting Under-Secretary-General for Humanitarian Affairs and Emergency Relief Coordinator* (14 October 2024), <https://www.ochaopt.org/content/statement-gaza-joyce-msuya-acting-under-secretary-general-humanitarian-affairs-and-emergency-relief-coordinator>; UNRWA, *Statement of UNRWA Commissioner-General Philippe Lazzarini to the United Nations General Assembly* (6 November 2024), <https://www.unrwa.org/newsroom/official-statements/statement-unrwa-commissioner-general-philippe-lazzarini-united-nations-general-assembly>; UN OCHA, *Attacks on hospitals in northern Gaza* (19 October 2024), <https://www.ochaopt.org/content/attacks-hospitals-northern-gaza>; Inter-Agency Standing Committee, *Statement by Principals of the Inter-Agency Standing Committee - Stop the assault on Palestinians in Gaza and on those trying to help them* (1 November 2024), <https://interagencystandingcommittee.org/inter-agency-standing-committee/statement-principals-inter-agency-standing-committee-stop-assault-palestinians-gaza-and-those-trying>.

⁹² Statement of Zvi Yehezkeli on The Seventh Eye, 19 December 2023: “Zvi Yehezkeli calls for the killing of 100 thousand Gazans”, *The Seventh Eye* (19 December 2023), <https://www.youtube.com/watch?v=EhYq4FvzQWM>; also available at Middle East Eye, @middleeasteye, TikTok (20 December 2023), <https://www.tiktok.com/@middleeasteye/video/7314598250047081761>.

⁹³ Yinon Magal, @YinonMagal, Tweet (2:40 pm, 31 December 2023), <https://twitter.com/YinonMagal/status/1741439243530928554>.

⁹⁴ Statement of Shai Golden on Channel 14, 17 October 2023: “Shai Golden to the terrorists of Hamas-ISIS: ‘We will reach Gaza, Lebanon, Iran and take revenge. We will return the Middle East to a situation where you will be deathly afraid of the Jews and we will do what is necessary so that you will ascend and meet Allah’”, *Now 14* (17 October 2023), <https://www.facebook.com/watch/?v=170459649451518> [1:35]; excerpt also available at Middle East Eye, @MiddleEastEye, Tweet (2:25 am, 20 November 2024), <https://twitter.com/MiddleEastEye/status/1726396420113207313>.

⁹⁵ Yehuda Schlesinger, @judash0, Tweet (8:57 pm, 30 November 2023), <https://twitter.com/judash0/status/173029958601912609>.

⁹⁶ “Yehuda Schlesinger”, *Israel Hayom*, <https://www.israelhayom.co.il/writer/יהודה-שליזינגר>; “Shay Golden”, *Now 14*, <https://www.now14.co.il/tag/שי-גולדן/>; “Yanor Magal and Ben Caspit”, *103FM*, <https://103fm.maariv.co.il/program/-ינון-מגל-בן-כספית.aspx>; “Zvi Yehezkeli”, *13TV*, <https://13tv.co.il/writer/zvi-yehezkeli/>.

⁹⁷ Riklin ran for the Knesset in the 2015 Israeli elections. See “Meet Shimon Riklin”, *Kipa* (2 January 2015) <https://www.kipa.co.il/ריקלין-שמעון-את-הכירו/בחרות/חדשות/>.

- On 8 October 2023, he stated on Channel 12: “Yesterday we were hit hard, and all day long we hear these things: ‘the IDF is moral. the IDF has values, IDF will evacuate, IDF is telling inhabitants . . . The Gazan people chose the Gazans. We didn’t hear of anyone there standing up and saying ‘guys, not the kids, not the women . . . on the contrary, they are handing out candy, there is support, there are small children who, there’s another video, horrifying, of children abusing a small blond Jewish boy. They are all guilty. There are no innocent [people] there . . . There are no innocents in Gaza. They are all celebrating, children are abusing, wait, let me finish [crosstalk] And the feeling of many Israelis is that the landlord needs to go nuts. No warning [ahead of time].”¹⁰⁴ Schlesinger re-posted this interview himself, accompanied by a ‘tweet’ reading

inter alia: “. . . There are no innocents in Gaza. All of Gaza supports terrorism. All of Gaza deserves to die. It’s time the landlord went crazy.”¹⁰⁵

- On 24 October 2023, he tweeted that: “There are no innocents in Gaza. There are no ordinary citizens in Gaza. Every adult educated [their children] to kill. Every woman is a monster. Every boy aspires to be a martyr. Every baby will grow up to be a terrorist. Wipe out, kill, destroy, annihilate.”¹⁰⁶
- On 18 November 2023 and on numerous subsequent occasions, he has continued to tweet that “there are no innocents in Gaza”.¹⁰⁷
- On 30 November 2023, Schlesinger ‘tweeted’: “Erase the Gaza Strip. They are all kill-worthy. All of them. Revenge”.¹⁰⁸
- On 18 April 2024, commenting on Israeli news Channel 12 — in relation to photographs showing Palestinians trying to cool off at the seashore in Gaza during a very hot day in April 2024 — he stated that: “[t]hese people there deserve death. A hard death, an agonizing death. And instead we see them enjoying on the beach and having fun . . . There are no innocent people there in the Gaza Strip . . . They are now enjoying on the beach, instead of starving, instead of being jerked around, instead of being severely tormented, instead of hiding from shelling . . . We should have seen there a lot more revenge, a lot more rivers of Gazans’ blood.”¹⁰⁹
- On 27 May 2024, he posted in response to the Israeli killing of displaced Palestinians in Rafah: “[u]ninvolved’ victims (as if).”¹¹⁰
- On 9 June 2024, Schlesinger posted on X that, “[t]here are no uninvolved in Gaza”, calling for “[z]ero compassion. Zero.”¹¹¹
- On 25 June 2024, he complained on Channel 12 about what he perceived to be a soft approach to Palestinians in Gaza, stating that, “I don’t understand why we are handling them with kid gloves, their so-called innocents. I don’t think there are any innocent individuals over there”, quoting Moti Elmoz’s statement that “the State of Israel should have reaped the wheat in Beit Hanoun. Taking over the territory is the only thing”, and emphasising “we should have been much more brutal. . . I’d expect their so-called innocent to be treated much more aggressively.”¹¹²

12. **Zvi (Zvika) Yehezkeili, one of the most prominent journalists in Israel** — “the most popular speaker in the Israeli media”,¹¹³ and the Israeli television “expert” on Arab and Palestinian affairs for the past 20 years, with 87,000 followers on

¹⁰⁵ *Ibid.*

¹⁰⁶ Yehuda Schlesinger, @judash0, Tweet (7:01 pm, 24 October 2023), <https://x.com/judash0/status/1716862391273529429>.

¹⁰⁷ Yehuda Schlesinger, @judash0, Tweet (12:05 pm, 19 November 2023), <https://x.com/judash0/status/1725998656136827335>;

Yehuda Schlesinger, @judash0, Tweet (5:04 pm, 28 November 2023), <https://x.com/judash0/status/1729516714704900318>;

Yehuda Schlesinger, @judash0, Tweet (9:36 pm, 14 December 2023), <https://x.com/judash0/status/1735383162572652995>.

¹⁰⁸ Yehuda Schlesinger, @judash0, Tweet (8:57 pm, 30 November 2023), <https://twitter.com/judash0/status/1730299958601912609>.

¹⁰⁹ Yehuda Schlesinger, @judash0, Tweet (1:45 pm, 18 April 2024), <https://twitter.com/judash0/status/1780925645440070128>.

Also available at B.M., @ireallyhateyou, Tweet (12:54 pm, 21 April 2024), <https://twitter.com/ireallyhateyou/status/1781999892866445473>.

See also the call by Channel 13 Anchor Moriah Asraf for what she calls the “gut-wrenching”

photographs of Palestinians, stating that this is “inconceivable”, Nimer Sultany, @NimerSultany, Tweet (4:10 pm, 18 April 2024), <https://twitter.com/NimerSultany/status/1780977255205700040>.

¹¹⁰ Yehuda Schlesinger, @judash0, Tweet (3:58 pm, 27 May 2024), <https://x.com/judash0/status/1795092108610555968>.

¹¹¹ Yehuda Schlesinger, @judash0, Tweet (8:26 am, 9 June 2024), <https://x.com/judash0/status/1799689592888598735>.

¹¹² Yehuda Schlesinger, @judash0, Tweet (8:52 am, 25 June 2024), <https://x.com/judash0/status/1805494283731873807>.

¹¹³ Uri Misgav, “Sanctifying the Indiscriminate Killing in Gaza Is Israel’s Second Defeat”, *Haaretz* (28 December 2023), <https://www.haaretz.com/opinion/2023-12-28/ty-article-opinion/.premium/sanctifying-the-indiscriminate-killing-in-gaza-is-israels-second-defeat/0000018c-ace3-d22d-a3dd-bdfbb0fe0000>.

TikTok¹¹⁴ and 317,000 followers on Facebook¹¹⁵ — “urges Gaza’s destruction nightly. The entire Gaza Strip.”¹¹⁶ Examples of his statements dehumanising Palestinians and inciting genocide against them include the following:

- On 18 October 2023, in a broadcast video, he asserted that “in Gaza there are almost no innocent [people]”.¹¹⁷
- On 30 October 2023, in a television news interview, he commented that “[i]f I agree with what is said here, if the definition is to destroy Hamas, you have to destroy everyone who is connected to Hamas. And everyone connected to Hamas is the government, officials, military personnel, supporters, clans and everyone who actually kicked out the PA in 2007 and established the Hamas rule. It’s hundreds of thousands. And to reach this goal you have to do it first and then see what happens.”¹¹⁸
- On 7 December 2023, he stated in a radio interview that: “Our objective is vague, to eliminate Hamas in the Gaza Strip. At the end of the day, you might need there to be no residents in the Gaza Strip. What can one do [meaning: what is the alternative]? Otherwise, any entity that will be there, will be an entity that attacks you. What can one do? These are refugee people. You are sitting on their lands.”¹¹⁹
- On 9 April 2024, Yehezkeli defended, in an interview, his repeated calls for a “cruel war” that was “never been seen here” that would include “100,000 dead” Gazans. He explained that his critics “do not understand” that “[i]n Gaza there is almost no such thing as innocent, or someone who does not support Hamas. All of Gaza, most of it, supports Hamas. The education is Hamas. The support is Hamas. And then I would start a war that would end in emigration. No more Gaza Strip.”¹²⁰

13. **Eliyahu Yosian** — an Israeli commentator and frequent panellist on Israeli television shows¹²¹ — repeatedly uses his public platform, including his social media accounts, to incite genocide. On 10 November 2023, Eliyahu Yosian was invited to give a lecture to “an elite reserve battalion” — including officers — of the Israeli army,¹²² notwithstanding his repeated genocidal statements in relation to Gaza, including:

- On 22 October 2023, he regretted that the level of killing in Gaza was insufficient, commenting that “In the first night, we should have taken down 50,000 Gazans [sic]. Blood revenge”¹²³ — an assertion he has repeated often

¹¹⁴ Zvi_Yehezkeili, TikTok, https://www.tiktok.com/@zvi_yechezkeili.

¹¹⁵ Zvi Yehezkeili, Facebook, https://www.facebook.com/zviyechezkeili?_rdr.

¹¹⁶ Gideon Levy, “It Is Forbidden to Even Empathize With Innocent Gazans”, *Haaretz* (26 October 2023), <https://www.haaretz.com/opinion/2023-10-26/ty-article-opinion/.premium/and-darkness-was-upon-the-face-of-israel/0000018b-6813-d78a-a5eb-7c93d6fe0000>.

¹¹⁷ “Zvi Yehezkeili: ‘In Gaza there are almost no innocents, there are those that are accomplices to crime’”, *Hidabroot TV* (18 October 2023), <https://www.hidabroot.org/article/1187139>.

¹¹⁸ Interview with Zvi Yehezkeili on News Edition, Oren Persico, “For the sake of the goal”, *The Seventh Eye* (30 October 2023), <https://www.the7eye.org.il/501524>.

¹¹⁹ Zvi Yehezkeili interview with Yanon Magal and Ben Caspit in Radio 103 (7 December 2023), <https://www.bhol.co.il/news/1625842>.

¹²⁰ “Zvi Yehezkeili interview with Oded Harosh on Hidabrut TV”, *Hidabroot* (9 April 2024), https://www.youtube.com/watch?v=t9249dT_ro4 [6:30].

¹²¹ “‘We will not last with liberal democracy’: Eliyahu Yosian in a special interview”, *Maariv* (14 November 2023), <https://www.maariv.co.il/culture/tv/Article-1051970>: “Since the war broke Eliyahu Yosian has become one of the prominent news-panel commentators on Israeli television”.

¹²² Eliahu Behruz Yosian, @limoodiran, Tweet (9:55 pm, 10 November 2023), <https://twitter.com/limoodiran/status/1723066905282462178>.

¹²³ TOV Jewish Current Affairs, @TOVnews1, Tweet (4:00 pm, 22 October 2023), <https://twitter.com/TOVnews1/status/1716092045012381790>; also available at Yehuda Shaul, @YehudaShaul, Tweet (6:38 pm, 25 October 2023), <https://twitter.com/YehudaShaul/status/1717219211540390059>.

including on Channel 14, Channel 11 and Channel 12, and “on any possible platform”.¹²⁴

- On 29 October 2023, he claimed in relation to Palestinians in Gaza that “[t]here are no innocents . . . There is no population. There are 2.5 million terrorists”.¹²⁵
- On 30 December 2023, in a television interview, he stated: “. . . Hamas is not the enemy, Gaza is the enemy. Now, the moment you change the terminology, the worldview is different, the definition of what an enemy is, is different, ‘knocking on the roof’ [Israeli term for announcing where the army will attack or bomb before doing so to let civilians evacuate] has no meaning anymore. There is no use giving orders about who can leave a neighbourhood. You ask me what I would have done? Nothing other than flattening. As many [dead] bodies as possible. Because a woman over there is an enemy. A baby over there is an enemy. A first grade class is an enemy. An armed Hamas militant is an enemy. A pregnant woman is an enemy. Because we see with our own eyes. . . But that child is learning how to use a Kalashnikov in first grade. He is not a child, he is a terrorist that is a child.”¹²⁶
- On 17 February 2024, he tweeted: “The enemy is not the tunnel! The enemy is not Hamas! The enemy is Gaza! The enemy is the family with the tunnel in the baby’s room. Victory = extermination + expulsion + occupation + Judaizing the area + annexation. As much as possible, when possible. Other than that we are just deceiving ourselves.”¹²⁷
- On 28 March 2024, he incited on X that: “[the] ‘Arab minor who threw rocks’, is the same Little Muhammad of 7/10. The same Little Muhammad [Muhammad Junior] who entered with Big Muhammad [Muhammad Senior]. Muhammad Junior burned and Big Muhammad raped, beheaded, abducted and murdered. Each Muhammad did what he could.”¹²⁸
- On 1 April 2024, in an interview with Channel 7, he stated that there is no distinction between Gaza and Hamas: “600,000 Jews arrived in the land of Israel, up to 800,000, at the beginning of the State of Israel... they won [the 1948 war]. Why? Because they had the [attitude] of the Red Army. Most of them were Mapainiks [Mapai was the ruling political party in Israel, led by David Ben Gurion] from the USSR. And the documentation. . . Look up on YouTube: ‘Eliyahu Yosian Ben Gurion’. I presented documentation showing that Ben Gurion had an Arab castration [military] unit. He established a unit, brought doctors, [and] taught that unit how to castrate Arabs. And forgive the expression, look at their method of warfare, how it didn't even give up on the testicles of their enemies. Keep it in [don't cut it out of the broadcast], because it's [said] with a smile. But [understand] how far they went to achieve victory. That is why liberal democracies, in the face of Hitler-style, October 6th style enemies, who

¹²⁴ Interview with Eliahu Yosian on Now 14 Israel, 29 October 2023: Now 14, @Now14Israel, Tweet (11:32 pm, 29 October 2023), <https://twitter.com/Now14Israel/status/1718742747455053922>: “I'm not saying [only] here on [channel] 14 I also said [it] on [channel] 11 and I also said [it] on 12 and I also said on... on any possible platform I said, it's not because now here is [channel] 14 I say it, on every platform”; also available at “2.5 million terrorists in Gaza, Says Former Israeli military Eliahu Yosian”, *Truth Untold* (30 October 2023), <https://www.youtube.com/watch?v=Q1-anvxOSok> [0:45 – 0:55].

¹²⁵ Interview with Eliahu Yosian on Now 14 Israel, 29 October 2023: Now 14, @Now14Israel, Tweet (11:32 pm, 29 October 2023), <https://twitter.com/Now14Israel/status/1718742747455053922>; also available in part at Ahmed Eldin, Instagram Post (30 October 2023), <https://www.instagram.com/reel/CzB77tJrjtW/>.

¹²⁶ Middle East Eye, @MiddleEastEye, Tweet (2:11 pm, 30 December 2023), <https://twitter.com/MiddleEastEye/status/1741069437518680399>.

¹²⁷ Eliahu Behruz Yosian, @limoodiran, Tweet (11:47 pm, 17 February 2024), <https://x.com/limoodiran/status/1758971526592762282>.

¹²⁸ Eliahu Behruz Yosian, @limoodiran, Tweet (9:11 am, 28 March 2024), <https://twitter.com/limoodiran/status/1773246584312017099>.

open a pregnant woman's belly, behead a fetus, they have no response, because their world view is completely Western.”¹²⁹

14. **Almog Boker, a prominent Israeli news presenter**, with 137,000 followers on Facebook,¹³⁰ over 114,000 followers on Twitter,¹³¹ and 152,000 followers on Instagram,¹³² was presented with a special award for his journalism on the military operation against Gaza on 18 March 2024,¹³³ despite making repeated broadcast statements calling for the mass destruction of Gaza, including that “Shujaiyyah should be erased to the ground.”¹³⁴ More recently, he has tweeted to his 110,000 followers, “total victory means destroying the entire area now. It is either them or us”¹³⁵ — making clear that the Israeli Prime Minister’s identification of “total victory” as one of Israel’s war aims in Gaza is understood to mean the total destruction of Gaza itself. Other examples of his incitement to genocide include the following:

- On 11 October 2023, he wrote for the website of Channel 13: “No matter how long it will take, no matter how many people in Gaza will get hurt. Our children's lives are more important than the lives of the despicable murderers on the other side of the fence. Gaza needs to be erased, and Hamas must be destroyed. It’s either us or them.”¹³⁶
- On 8 December 2023, he shared a post on Instagram in which he stated that “[t]here is no such thing as uninvolved in Gaza. Everyone is involved. Everyone is Hamas.” In the post, he quotes a resident of an Israeli ‘Gaza Envelope’ community who says “. . . There is no such thing as uninvolved [individuals]. No one can be trusted. Anything beyond the fence should be erased, I want to see nothing but the sea.”¹³⁷
- On 23 April 2024, he tweeted criticising an announcement by Israeli army’s spokesman in Arabic requiring residents in Beit Lahia to evacuate, stating: “We learned nothing! Gazans who allow rockets to be fired from their homes are not uninvolved! They are fully involved. Any area from which rockets are launched at our children (certainly an area they are not allowed to be in at all), should be destroyed. Must be destroyed. Without prior notice. It’s either them — or us.”¹³⁸

¹²⁹ Yoni Kampinsky, “Eliahu Yosian to Channel 7: Victory Image – Jewish Settlement in Gaza”, *Inn* (1 April 2024), <https://www.inn.co.il/news/633596>; “Eliahu Yosian to Channel 7: Victory Image – Jewish Settlement in Gaza”, *Channel 7* (2 April 2024), <https://www.youtube.com/watch?v=FoeSWtPBwzA>.

¹³⁰ Almog Boker, Facebook, https://www.facebook.com/people/%D7%90%D7%9C%D7%9E%D7%95%D7%92-%D7%91%D7%95%D7%A7%D7%A8/100044291083242/?locale=he_IL.

¹³¹ Almog Boker, @bokeralmog, Twitter, <https://x.com/bokeralmog?lang=en>.

¹³² Almog Boker, @boker.almog, Instagram, <https://www.instagram.com/boker.almog>.

¹³³ “Almog Boker for Channel 14: This is the prestigious award he will boycott”, *Ice* (18 March 2024), <https://www.ice.co.il/tv/news/article/1005255>.

¹³⁴ Nimer Sultany, @NimerSultany, Tweet (5:41 pm, 14 December 2023), <https://twitter.com/NimerSultany/status/1735324123318874553>. See also Nimer Sultany, @NimerSultany, Tweet (7:11 pm, 20 December 2023), <https://twitter.com/NimerSultany/status/1737521095610138629>: “First of all the hostages, after that we will continue with the destruction”.

¹³⁵ Almog Boker, @bokeralmog, Tweet (11:39 am, 23 April 2024), <https://twitter.com/bokeralmog/status/1782705743587660195>; also available at Younis Tirawi, @ytirawi, Tweet (11:46 am, 24 April 2024), <https://twitter.com/ytirawi/status/1783069968654798963/photo/1>. See also Almog Boker, @bokeralmog, Tweet (4:24 pm, 23 April 2024), <https://twitter.com/bokeralmog/status/1782777513678196933>, also available at Younis Tirawi, @ytirawi, Tweet (11:46 am, 24 April 2024), <https://twitter.com/ytirawi/status/1783069968654798963/photo/2>: “We learned nothing! Gazans who allow rockets to be fired from their homes are not uninvolved! They are fully involved. Any area from which rockets are launched at our children (certainly an area they should not be at all), should be destroyed. must be destroyed without prior notice. It's either them - or us”.

¹³⁶ Almog Boker, “If Hamas stays here – the residents of the [Gaza] Envelope won’t return home. Opinion”, *Channel 13* (11 October 2023), <https://13tv.co.il/item/news/opinions/z6xse-903745072/>.

¹³⁷ Almog Boker, @boker.almog, Instagram Post (8 December 2023), <https://www.instagram.com/p/C0IV9bWohXI>. The post was also reported on in “Almog Booker reveals a shocking story: ‘There is no such thing as non-involved in Gaza’”, *Ice* (8 December 2023), <https://www.ice.co.il/media/news/article/991671>.

¹³⁸ Almog Boker, @bokeralmog, Tweet (4:24 pm, 23 April 2024), <https://x.com/bokeralmog/status/1782777513678196933>.

- On 8 June 2024, in a post on X, he stated “each of the one hundred casualties (according to Gazan reports) in the operation to rescue the captives today” in Nuseirat — which included children — “is involved.”¹³⁹

15. Yinon Magal, host of Israeli ‘Now 14’ TV panel show ‘the Patriots’, journalist and former Member of Knesset, has frequently dehumanised Palestinians, celebrated their suffering and incited genocide against them:

- On 9 October 2023, he tweeted an image of a destroyed section of Gaza with the following caption: “This is how all of Gaza should look like. All of Gaza.”¹⁴⁰
- On 26 May 2024, in a post on X, he celebrated the mass deaths of Palestinians, including labelling the 26 May 2024 shelling in Rafah the “central [bonfire] lighting this year in Rafah” for the Lag Ba’Omer celebrations¹⁴¹ — which was also repeated by other journalists and commentators.¹⁴²
- On 8 June 2024, in a post on X, he said the estimated 150-200 Palestinians killed in the Israeli Army’s operation in Nuseirat was a “[g]reat deal 🙏🙏 Thanks Bibi 🙏🙏”.¹⁴³
- On 9 June 2024 in a post on X, Magal claimed that “the civilian population is aware of hostages being held in the heart of Nuseirat camp. They are all complicit in the criminal act of kidnapping Israelis and holding them for many months.” He quoted a statement that reads: “There are no uninvolved [people]! Everyone who was involved . . . their blood will be on their heads [idiom originating from Joshua 2:19, meaning ‘they will pay with their head’]. This [operation resulting in the mass death of Palestinian civilians] is the right way to return the hostages and maintain the security of the State of Israel.”¹⁴⁴ That same day, he had also posted on X that: “[t]he people of Israel prayed this Shabbat in their magnificent synagogues while the enemy prayed over their rubble. May it continue like this for many years to come”.¹⁴⁵
- On 12 June 2024, on “the Patriots” panel show on Channel 14, he said that, “[f]inally an honourable operation by the IDF — [they] rescued 4 people, killed approximately 300 terrorists and supporters there. Finally acting by a code of honour”.¹⁴⁶
- On 30 June 2024, in a video interview, he said that he has opposed allowing any evacuation of Palestinians from Gaza for medical treatment on the basis that, “[t]hese are the same people who celebrated in the streets, who are dying to

¹³⁹ Almog Boker, @bokeralmog, Tweet (4:22 pm, 8 June 2024), <https://x.com/bokeralmog/status/1799446912380141763>, also available at B.M., @ireallyhateyou, Tweet (8:21 pm, 9 June 2024), <https://x.com/ireallyhateyou/status/1799869360632123709>.

¹⁴⁰ Yinon Magal, @YinonMagal, Tweet (11:01 am, 9 October 2023), <https://twitter.com/YinonMagal/status/1711305837854015571>, also available at Jessica Buxbaum, “‘Erase Gaza’: How genocidal rhetoric became normalised in Israel”, *New Arab* (30 November 2023), <https://www.newarab.com/analysis/erase-gaza-how-genocidal-rhetoric-normalised-israel>.

¹⁴¹ Original tweet deleted, available at Ihab Hassan, @IhabHassane, Tweet (11:34 pm, 26 May 2024), <https://x.com/IhabHassane/status/1794844694637314193>; “In the eyes of the world, a disaster happened in Rafah, in Israel it is an ‘incident’”, *Haaretz* (28 May 2024), <https://www.haaretz.co.il/gallery/television/tv-review/2024-05-28/ty-article/.highlight/0000018f-bd9c-d0b7-abdf-fdbed5650000>.

¹⁴² See, e.g., Bazz News Telegram channel, screenshot of post available at B.M., @ireallyhateyou, Tweet (12:51 am, 27 May 2024), <https://x.com/ireallyhateyou/status/1794863917740736563>; Yair Ansbacher, @AnsbacherYair, Tweet (11:28 pm, 26 May 2024), <https://x.com/AnsbacherYair/status/1794843112445292972>, also available at B.M., @ireallyhateyou, Tweet (12:55 am, 27 May 2024), <https://x.com/ireallyhateyou/status/1794864864101634474>.

¹⁴³ Yinon Magal, @YinonMagal, Tweet (10:55 pm, 8 June 2024), <https://x.com/YinonMagal/status/1799545803536474151>.

¹⁴⁴ Yinon Magal, @YinonMagal, Tweet (12:32 pm, 9 June 2024), <https://x.com/YinonMagal/status/1799751340077277315>.

¹⁴⁵ Yinon Magal, @YinonMagal, Tweet (12:22 am, 9 June 2024), <https://x.com/YinonMagal/status/1799567671685492957>.

¹⁴⁶ Now14, @Now14Israel, Tweet (11:38 pm, 12 June 2024), <https://x.com/Now14Israel/status/1801006218925711814>.

destroy us. And yet [we] are still talking about putting them in treatment here in hospital — have you gone mad?”¹⁴⁷

- On 14 July 2024, Yinon Magal posted on X on a video of Israel bombing Gaza: “blot out the memory of Amalek from under heaven. Do not forget!”¹⁴⁸

16. **David Mizrahy Verthaim, a journalist and radio presenter**, said on 7 October 2023 in a post on X (formerly ‘twitter’): “. . . proportionality. We need a disproportionate response. Israel needs to show what she is hiding in the basement. If all the captives are not returned immediately, turn the Strip into a slaughterhouse. If a hair falls from their head — execute security prisoners. Violate any norm, on the way to victory — they should be made an example of [so that others will see and be afraid] . . . Those we’re facing are human animals who don’t hesitate to violate basic rules, including the murder of medical staff and babies. You don’t just move on after this.”¹⁴⁹

17. On 27 October 2023, in a tweet, **Yosef Yisrael, an Israel journalist and news anchor**, stated: “Dear fighters, operate in Gaza in your most lethal fashion: kill, kill and kill. Gaza should stink from the corpses of Hamas members and their aides[.] The aims [of the war] will not be achieved otherwise. Don’t take risks. Anything that moves within in the boundaries of your sector — shoot. And most importantly — come back safely.”¹⁵⁰

18. On 9 November 2023, **Ofer Hadad, a journalist and TV anchor**, posted on X: “The world finally understands who these animals that we’re dealing with are. There are golden hours that are running out. This allows the IDF to exact a much heavier price from Gaza. Not only from Hamas. Everyone who is celebrating now in Gaza — should cry. It’s that simple. In Gaza they are still not begging for their lives. Neither Hamas nor the citizens. Wake up from the shock.”¹⁵¹

19. **Shai Golden, a prominent Israeli journalist**, has also made numerous statements dehumanising Palestinians or inciting genocide against them:

- In November 2024 he stated in a monologue on Channel 14: “And we’re telling you every day: We are coming. We are coming to Gaza, we are coming to Lebanon. We’re gonna come to Iran. We’ll come anywhere. Take into account how many of you we’re going to kill, and how much we’re going to carry out against you, for every one of the 1,300 people you murdered, that you robbed. You’ve never seen such numbers in the [entire] history of the Arab nation. I’m updating you that it’s coming. In case you’re confused, I’m updating you that it’s coming. Numbers that you never even imagined can be reached. And we are ready to go into international isolation, and we are ready to quarrel with the US, and ready to quarrel with the whole world and its sister, as many [of you] as needed until all of you, including all of your supporters, ascend to meet Allah [in heaven], we will kill. Let it be clear, that’s the situation in Israel, that’s the sentiment. So celebrate on all your social media networks, do “Free Palestine” [in English], do all your wretchedness. And we will come to exterminate you.

¹⁴⁷ Now14, @Now14Israel, Tweet (10:51 pm, 30 June 2024), <https://x.com/Now14Israel/status/1807517349920030947>.

¹⁴⁸ Yinon Magal, @YinonMagal, Tweet (10:27 am, 14 July 2024), <https://x.com/YinonMagal/status/1812584673685438914>.

¹⁴⁹ David Mizrahy Verthaim, @dverthaim, Tweet (5:52 pm, 7 October 2023), <https://twitter.com/dverthaim/status/1710684531114602891>.

¹⁵⁰ Yosef Yisrael, @Yosefyisrael25, Tweet (7:25 pm, 27 October 2023), <https://x.com/yosefyisrael25/status/1717955729204621822>; also available at Lior, @Wollybon, Tweet (11:20pm, 1 July 2024), <https://x.com/Wollybon/status/1807886942974996940>.

¹⁵¹ Ofer Hadad, @Ofer_Hadad, Tweet (7:33 am, 9 October 2023), https://twitter.com/Ofer_Hadad/status/1711253419095171236.

Exterminate. Ex-ter-mi-nate. Pass this on. Play this clip, so all your friends see what we're going to do to you.”¹⁵²

- On 23 June 2024 he stated on Channel 14: “[A]fter October 7th, we’re not willing to see a single Palestinian here. Not even one. One. Not from Judea and Samaria, certainly not from Gaza, no one will come here from Gaza. Over our dead body will a Gazan enter here. And over our dead body will a Palestinian worker from Judea and Samaria enter here as well. The Israeli public is not willing to see Palestinians on its streets. No matter what agreement will be signed . . . We are not willing to see Palestinians here. We are not willing to walk the streets and see those people.”¹⁵³
- On 22 August 2024, he stated — in response to allegations, later proven false, that Israel’s State Attorney had recommended a criminal investigation of singer Eyal Golan for his call to erase Gaza¹⁵⁴ — that, “[t]he State Attorney really wants to indict an Israeli because he called to ‘erase Gaza’ three days after October 7th . . . Aisman, there is no Israeli who didn’t want to erase Gaza at least once since October 7th.”¹⁵⁵

20. In their Israeli English-language podcast “**Two Nice Jewish Boys**”, host **Eytan Weinstein** and cohost **Naor Meninger**¹⁵⁶ made the following statements dehumanising Palestinians in Gaza and inciting genocide:

- On 9 August 2024, Eytan Weinstein states in the podcast to cohost, Naor Meninger that, “in Gaza maybe there’s mass destruction but there’s not massive death or deportation . . . if you’re listening to our words and saying how could they be advocating to do massive bombing, indiscriminate bombing, how could they talk about killing children: we’re not advocating to target children but forgive us if we don’t give a shit if you know everybody there dies. It’s just the way we feel, it’s just the way Israelis feel . . . if you gave me a button to just erase Gaza, every single living being in Gaza would no longer be living tomorrow, I would press it in a second. I think most Israelis would. Even if it’s not right now [that it would be between his family or Gaza] I would press it right now. [Same with the territories] Even if [his wife] is safe at home. I would press it right now, give me that button. And I think most Israelis would . . . they wouldn’t even hesitate . . . you press this, all Palestinians are gone, you’d be like fuck yeah, is there another one.”¹⁵⁷ In another instance, Naor Meninger stated “we went to a concert . . . and you can’t help but think that it’s nice to know that you’re dancing in a concert while hundreds of thousands of Gazans are homeless . . . if only they put live footage of Gaza”. Eytan Weinstein affirmed “seriously, that’s what people don’t understand . . . seriously this is how Israelis feel.”¹⁵⁸
- In September 2024 host Eytan Weinstein states to cohost, Naor Meninger “no one actually gives a shit . . . do you care if this baby in Gaza gets polio”.¹⁵⁹ In

¹⁵² Middle East Eye, @MiddleEastEye, Tweet (2:25 am, 20 November 2023), <https://twitter.com/MiddleEastEye/status/1726396420113207313>.

¹⁵³ B.M., @ireallyhateyou, Tweet (9:33 pm, 23 June 2024), <https://x.com/ireallyhateyou/status/1804961107330605258>.

¹⁵⁴ “State attorney seeks probe into pop singer Eyal Golan for calling to ‘erase Gaza’”, *Times of Israel* (18 August 2024), <https://www.timesofisrael.com/state-attorney-seeks-probe-into-pop-singer-eyal-golan-over-calls-to-erase-gaza/>; Rachel Fink, “‘Wipe Out Gaza’: State Prosecutor Advises Against Probing Israeli Megastar Eyal Golan Over Incitement”, *Haaretz* (19 August 2024), <https://www.haaretz.com/israel-news/2024-08-19/ty-article/.premium/state-prosecutor-mulls-probe-of-israeli-megastar-eyal-golan-for-calling-to-wipe-gaza-out/00000191-6a82-dda8-af9b-6fe244840000>.

¹⁵⁵ B.M., @ireallyhateyou, Tweet (10:52 pm, 22 August 2024), <https://x.com/ireallyhateyou/status/1826724065023066240>.

¹⁵⁶ Meninger has done media for Israeli Prime Minister Benjamin Netanyahu’s last five political campaigns: Evan Dyer, @EvanDyerCBC, Tweet (2:33 am, 4 September 2024), <https://x.com/EvanDyerCBC/status/1831128415795061127>.

¹⁵⁷ Abier, @abierkhatib, Tweet (4:06 pm, 3 September 2024), <https://x.com/abierkhatib/status/1830970621225787819>.

¹⁵⁸ H. Redacted, @of_darkness07, Tweet (3:41 pm, 3 September 2024), https://x.com/of_darkness07/status/1830964221183697155.

¹⁵⁹ H. Redacted, @of_darkness07, Tweet (3:41 pm, 3 September 2024), https://x.com/c_of_darkness/status/1830964221183697155.

another clip, Eytan Weinstein states “the death toll is at 30 — something thousand . . . I don’t care if we killed tens of thousands”, while Naor Meningher affirms “most of them are involved in terror.”¹⁶⁰

21. Genocidal views are also routinely given a platform on Israeli television panel shows, in television and radio interviews, and in Israeli news outlets, where they are aired without sanction. By way of example:

- On 15 October 2023, **Israeli news outlet Arutz Sheva** published an English language piece referencing Amalek, and calling for the destruction of Amalek: “Amalek has lifted its head again, and this is the message of what we are to do to them, as is written in 1 Samuel 15, in accordance with Devarim 25. Let this be a warning - and a directive - to our leaders, who have failed us for far too long: . . . Now, go and attack Amalek. Completely destroy all that they have. Do not spare them, but put to death both man and woman, child and infant, both ox and sheep, camel and donkey.”¹⁶¹
- On 28 December 2023, in a television interview, **commentators on Israel’s Channel 14** called for the total annihilation of Gaza, stating that “We must demolish, eliminate and destroy them. We should go crazy for once. I said this one, two, three months ago — we must kill 150,000 on the first day. Now they are suggesting this, they realised that this is what should have been done” and “And we must demolish every house our soldiers come across, the ones fighting in Khan Younis, every building must be demolished. Gaza should just be sand, sand like the seashore.”¹⁶²
- In December 2023, also in a televised interview on **Channel 14, Danny Neumann, a former soccer player and current commentator**, called for the extermination of Palestinians in Gaza by stating: “And that’s why I say, in Gaza everyone, without exception, [are] terrorists, sons of dogs. They need to be toppled, destroyed, as far as I’m concerned, kill them all. Turn everything into dust. The IDF will disarm the area and we will begin to build new areas there for us, first of all, for our security.”¹⁶³
- On the episode broadcast on 10 February 2024, various **panellists on Israeli ‘Now 14’ panel show ‘the Patriots’** commented: “I do not feel sorry for Gazans. I do not think that there is anyone in Israel that should have pity on the Gazans. Not for the men, not for the elderly, and not for the children. . . . The Gazans? For all I know they can starve to death. Why should we care about them?” and “even if we defeat Hamas, if we do get the hostages back, we will not leave Gaza. You will continue to starve, continue to die, your houses will keep being burnt, your children will continue living in the mud and the nylon until the last hostage is returned.”¹⁶⁴
- On 1 March 2024, comments on a **radio programme between a former settlement organisation spokesperson and the Dean of the Faculty of Law of a private Israeli college** included: “the amount of uninvolved people in Gaza is marginal, marginal, marginal”; “it’s an entire nation that chose total evil”;

¹⁶⁰ H. Redacted, @of_darkness07, Tweet (3:45 pm, 3 September 2024), https://x.com/c_of_darkness/status/1830965334070960568.

¹⁶¹ Yshai Amichai, “Amalek has lifted its head again: A warning – and a directive – to our leaders and our people”, *Arutz Sheva* (15 October 2023), <https://www.israelnationalnews.com/news/378508>.

¹⁶² “Commentators on Israel’s Channel 14 say Gaza should be demolished into sand”, *MiddleEastEye*, https://www.youtube.com/shorts/eRRqAmcyO_E.

¹⁶³ Middle East Eye, @MiddleEastEye, Tweet (5:20 pm, 26 December 2023), <https://twitter.com/MiddleEastEye/status/1739667383243956311>.

¹⁶⁴ “The Patriots with Yanon Magal: 10.2.2024 | The full program”, *Now 14* (11 February 2024), <https://www.youtube.com/watch?v=VWBmQQPKqdl> [24:30]-[30:10], also available at Younis Tirawi, @ytirawi, Tweet (12:21 am, 11 February 2024), <https://twitter.com/ytirawi/status/1756624608633974877>.

“we know exactly, exactly, exactly, exactly, what is the definition of total evil and how to annihilate total evil”; and “[w]hat did Samuel the Prophet say to Saul, who showed mercy towards Agag [the Biblical king of the Amalekites] and the sheep?” (referring to the Biblical story of Amalek — invoked by the Israeli Prime Minister — wherein Saul was commanded to “kill alike men and women, infants and sucklings, oxen and sheep, camels and asses” — and in which Saul was reprimanded for not having fulfilled this commandment).¹⁶⁵

- On 9 July 2024, **Israeli media house “What’s new?”** posted the following comments on a video showing a child crying for his brother killed by the IDF: “After another difficult night for Gazans in the Gaza Strip, intense attacks by the IDF — many wounded and killed. May all of Gaza burn to the ground!”¹⁶⁶
- On 16 August 2024, a publication by **Uri Kirshenbaum Yitzhar on Srugim News** made the following statement: “If those who raise the terrorists and name squares after them will not feel the heavy Jewish wrath — they will quickly raise the replacements of the terrorists that we killed yesterday in some brilliant intelligence operation. I’m not the only one who knows it. The IDF, Netanyahu, the cabinet, the Left, everybody knows it. This was precisely their goal in the war in Gaza: for a while the IDF bombed Gaza almost indiscriminately, multi-storied houses and buildings, knowing full well that many children and mothers would be killed. There is a simple understanding that the civilian population who was happy to see the horrible massacre in Gaza Envelope on TV should receive an unforgettable blow. An obvious defense strategy led Israel to pummel Gaza’s ‘innocents’ very harshly because there is no other way to win and eradicate Hamas. It is deliberate, it is strategic, it is right. Let no one pretend otherwise. And now can someone explain to me why what is right for Gaza isn’t right for Jenin and Tul Karem, Hebron and Nablus.”¹⁶⁷

22. Footage of the systematic ill-treatment of Palestinians from Gaza under Israeli interrogation and in Israeli prisons is also broadcast to Israeli civilians.¹⁶⁸ In one broadcast showing a prison where Palestinians, alleged to be Hamas members, are detained, the commentator remarks that “[t]here is nothing . . . “[t]he beds are empty, with no mattresses . . . we control them 100% — Their food, their cuffing, their sleep . . . [we] show them that we are the owners of the house”.¹⁶⁹ The slogan ‘masters of the house’ was the election slogan of Minister of National Security, Itamar Ben-Gvir.¹⁷⁰

¹⁶⁵ “Emily and the Professor - Yuval Elbashan and Emily Amrusi”, *Kan Reshet Bet* (1 March 2023), <https://www.kan.org.il/player?itemId=714031&playerType=Radio>. See Sefaria, I Samuel 15:3, JPS, 1985, https://www.sefaria.org/I_Samuel.15.1-34?lang=bi. This post has since been removed, however, a copy of excerpts of the interview can be found at B.M., @ireallyhateyou, Tweet (4:47 am, 5 March 2024), <https://twitter.com/ireallyhateyou/status/1764845142802940216>; B.M., @ireallyhateyou, Tweet (4:47 am, 5 March 2024), <https://twitter.com/ireallyhateyou/status/1764845147185950940>; B.M., @ireallyhateyou, Tweet (4:47 am, 5 March 2024), <https://twitter.com/ireallyhateyou/status/1764845149517926468>.

¹⁶⁶ Khaled Yousry, @KhaledYousry22, Tweet (12:44, 9 July 2024), <https://x.com/KhaledYousry22/status/1810625960976240768>.

¹⁶⁷ Uri Kirshenbaum Yitzhar, “Jit and Rafah should share the same fate”, *Srugim* (16 August 2024), <https://www.srugim.co.il/1029151-%D7%93%D7%99%D7%9F-%D7%92%D7%99%D7%AA-%D7%9B%D7%93%D7%99%D7%9F-%D7%A8%D7%A4%D7%99%D7%97>.

¹⁶⁸ “Israel Channel 13 prison tour 18.2.2024”, *Jonathan Ofir* (1 March 2024), <https://www.youtube.com/watch?v=jvllPxxS8Pg>; “‘Segulah Individuals’ - a dramatic day with Givati fighters from the battle in the heart of Khan Yunis”, *Hallel Bitton Rosen* (17 February 2024), <https://www.youtube.com/watch?v=EWtEQYxJr84&>; Quds News Network, @QudsNen, Tweet (5:33 pm, 2 February 2024), <https://twitter.com/QudsNen/status/1753441486358679852>.

¹⁶⁹ “Israel Channel 13 prison tour 18.2.2024”, *Jonathan Ofir* (1 March 2024), <https://www.youtube.com/watch?v=jvllPxxS8Pg> [4:22-5:57]; from “‘Everyone here is a murderer from the Nuh’ba’: a glimpse of the guarded prison in Israel”, Channel 13 (18 February 2024), <https://www.youtube.com/watch?v=jBp7eEHH2fo>. Also available at B.M., @ireallyhateyou, Tweet (2:32 pm, 19 February 2024), <https://x.com/ireallyhateyou/status/1759571542382436645>.

¹⁷⁰ Bethan McKernan and Quique Kierszenbaum, “Hebron’s Jewish settlers take heart from far-right polls surge in Israel”, *The Guardian* (12 November 2022), <https://www.theguardian.com/world/2022/nov/12/hebrons-jewish-settlers-take-heart-from-far-right-polls-surge-in-israel>.

Incitement to Genocide in Parts of Broader Israeli Society

23. Direct and public incitement to genocide is now commonplace in Israeli society. Views that appear now as mainstream include: “I don’t believe in innocent civilians. I think everyone there is a terrorist”¹⁷¹ — reflecting the words of Israeli President Herzog himself;¹⁷² and expressions of “disappoint[ment] that there wasn’t more destruction to Northern Gaza. It should be completely destroyed and handed over to us”¹⁷³ — again reflecting the dominant Israeli political narrative.¹⁷⁴ On 15 November 2023, the New York Times reported that, “[c]alls for Gaza to be ‘flattened,’ ‘erased’ or ‘destroyed’ had been mentioned about 18,000 times since Oct. 7 in Hebrew posts on X, said FakeReporter, an Israeli group that monitors disinformation and hate speech. The phrases were only mentioned 16 times in the month and a half before the war.”¹⁷⁵

Other public figures

24. Public figures such as singers, have also made numerous dehumanisation and incitement to genocide statements pertaining to Palestinians and Gaza:

- On 15 October 2023, **singer Eyal Golan** stated the following in a television news interview: “Erase Gaza, do not leave one person there.”¹⁷⁶
- On 12 November 2023, Israeli newspaper Walla! reported that **singer Kobi Peretz** posted on his Instagram account: “Gaza must be erased and destroyed along with all of Amalek’s seed, with or without an atom [bomb], we must simply destroy all of Gaza and annihilate everyone there, because everyone there is a terrorist, losers, scum. Get our captives out and erase this entire place that sows and wreaks havoc in all of the world.”¹⁷⁷
- On 25 December 2023, in an Israeli publication, **singer Eyal Golan** stated that he wanted “[t]o see our heroic soldiers return safely and Gaza destroyed once and for all. Am Yisrael Chai [in Hebrew: the people of Israel live, common Jewish rallying cry].”¹⁷⁸
- On 10 March 2024, **singer Kobi Peretz** was given a public platform on ‘the Patriots’ show on Channel 14, hosted by **journalist and former Member of Knesset Yinon Magal**, to defend his genocidal song ‘May your Village Burn’,¹⁷⁹ having been asked to leave an Israeli army base a few days earlier, by an Israeli

¹⁷¹ B.M., @ireallyhateyou, Tweet (3:45 pm, 29 March 2024), <https://twitter.com/ireallyhateyou/status/1773708003515990189>.

¹⁷² Rageh Omaar, “Israeli president Isaac Herzog says Gazans could have risen up to fight ‘evil’ Hamas”, *ITV News* (13 October 2023), <https://www.itv.com/news/2023-10-13/israeli-president-says-gazans-could-have-risen-up-to-fight-hamas>. President Herzog stated, “It’s an entire nation out there that is responsible. It’s not true this rhetoric about civilians not aware not involved. It’s absolutely not true ... and we will fight until we break their backbone”.

¹⁷³ Censored Men, @CensoredMen, Tweet (9:50 pm, 8 April 2024), <https://twitter.com/CensoredMen/status/1777423710112055377>.

¹⁷⁴ See Annex I: STATEMENTS EVIDENCING GENOCIDAL INTENT AND INCITEMENT TO GENOCIDE BY SENIOR ISRAELI GOVERNMENTAL OFFICIALS.

¹⁷⁵ Mark Landler, “‘Erase Gaza’: War Unleashes Incendiary Rhetoric in Israel”, *New York Times* (15 November 2023), <https://www.nytimes.com/2023/11/15/world/middleeast/israel-gaza-war-rhetoric.html>.

¹⁷⁶ Interview with Eyal Golan on Now 14, 15 October 2023: Now 14, @Now14Israel, Tweet (1:24 pm, 15 October 2023), <https://twitter.com/Now14Israel/status/1713531211300167928>. See also Chen Maanit, “State Prosecutor Advises Against Probing Israeli Ministers, MKs Who Called to Harm Gazans”, *Haaretz* (19 August 2024), <https://www.haaretz.com/israel-news/2024-08-19/ty-article/.premium/state-prosecutor-advises-against-probing-israeli-ministers-mks-who-called-to-harm-gazans/00000191-6c00-d1ee-afb5-6e39b4a30000>.

¹⁷⁷ “Kobi Peretz: ‘Kahane Was Right In Every Word. The Anti-War Protestors Are Filthy Treasonous Dogs’”, *Walla!* (12 November 2023), <https://e.walla.co.il/item/3622003>.

¹⁷⁸ “Eyal Golan shares: ‘To see Gaza destroyed once and for all’”, *Ice* (25 December 2023), <https://www.ice.co.il/media/news/article/993820>.

¹⁷⁹ See e.g. “Peretz sings may your village burn 2”, *OfekCenter* (26 November 2023), <https://www.youtube.com/watch?v=xcH2o4c5KZY>.

officer. In the discussion, to audience applause, panellist Itamar Fleishman stated “I don’t know if you are following the news. We are burning their village. And it is good that we are burning their village”, and Peretz asserted that “not only I say this by the way, all the soldiers think like me, like my dear friend said, we are not burning their village, we are erasing their village and we need to burn their village, I am allowed to say what he is not allowed to say”. Host Yinon Magal and others then derided the comments of one of the panellists that slogans such as ‘may your village burn’ “don’t exactly help us in the international effort”, referencing the proceedings before the ICJ pertaining to the Genocide Convention. Magal asserted — to further audience laughter and applause — that “There is also a red line. I am just reminding you that Biden has set a red line for us and that is thirty thousand Palestinians . . . Twenty nine thousand and ninety nine passes”,¹⁸⁰ making clear that the song and slogan ‘may your village burn’ is widely understood to relate to the mass killing of Palestinians in Gaza.

Amalek in Israeli popular culture

25. The Prime Minister’s invocation of the Hebrew Bible story of the destruction of Amalek has been widely understood to refer to the total destruction of Gaza and of Palestinians: advertisements on Israel’s public bus service and taxis feature slogans such as “Thou shall blot out the memory of Amalek. Thou shall not forget! [Deuteronomy 25:19]”¹⁸¹ and cars display the sticker “finish them” on their bumpers.¹⁸² References to Amalek are prolific in Israeli public discourse, with Israeli public figures openly referring to Gaza as “the land of Amalek”,¹⁸³ and asserting “we have an obligation to remember what Amalek did to us, defeat him, and erase even his memory!”¹⁸⁴

Dehumanisation of Palestinians

26. The dehumanisation of Palestinians is repeated throughout Israeli society. The privately-run Telegram account “Dead Terrorists” — established in 2022, but only active between October 2023 and July 2024 — posted dehumanising pictures of Palestinians to over 120,000 followers. These include a photograph of the emaciated body of Yazan Kafarna, a 10-year-old Palestinian child with cerebral palsy who died of starvation on 4 March 2024 photoshopped into a poster for the film ‘E.T.’;¹⁸⁵ and a picture of a limb from the Al Mawasi massacre of 13 July 2024¹⁸⁶ with the caption “It isn’t easy doing (food) deliveries on such a hot day.”¹⁸⁷

¹⁸⁰ The Patriots with Yinon Magal | 10.03.2024 | The full program” (10 March 2024), *Now 14*, https://www.youtube.com/watch?v=yYBi_P2JzX8 [1:09:14], also available at B.M., @ireallyhateyou, Tweet (12:45 pm, 14 March 2024), <https://x.com/ireallyhateyou/status/1768045698350465445>; B.M., @ireallyhateyou, Tweet (12:45 pm, 14 March 2024), <https://x.com/ireallyhateyou/status/1768045702418976852>.

¹⁸¹ Tali, @TalulaSha, Tweet (5:44 pm, 4 February 2024), <https://twitter.co/TalulaSha/status/1754199155151433737>; Yehuda Shaul, @YehudaShaul, Tweet (3:31 pm, 6 February 2024), <https://twitter.com/YehudaShaul/status/1754890582932029478>.

¹⁸² Jalal #CeasefireNow, @JalalAK_jojo, Tweet (5:15 pm, 17 February 2024), https://twitter.com/JalalAK_jojo/status/1758872802319348027.

¹⁸³ Jonathan Serero, @sererjonathan, Tweet (10:04 am, 24 March 2024), <https://twitter.com/sererjonathan/status/1771810346560290831>.

¹⁸⁴ Nili Kupfer-Naouri, @NaouriNili, Tweet (10:15 am, 24 March 2024), <https://twitter.com/NaouriNili/status/1771828123312542008>.

¹⁸⁵ IMAGES — “Israeli mock Palestinian child with Cerebral Palsy who died from malnutrition in Gaza”, *RoyaNews* (8 March 2024), <https://en.royanews.tv/news/49939>.

¹⁸⁶ UN OHCHR, *Renewed wave of deadly Israeli strikes on Gaza must stop – UN Human Rights Office* (19 July 2024), <https://www.ohchr.org/en/press-briefing-notes/2024/07/renewed-wave-deadly-israeli-strikes-gaza-must-stop-un-human-rights>; UN OCHA, *Humanitarian Situation Update #191 | Gaza Strip* (15 July 2024), <https://www.ochaopt.org/content/humanitarian-situation-update-191-gaza-strip>.

¹⁸⁷ Dead Terrorists, @dead_terrorists, Telegram (14 April 2024), https://t.me/dead_terrorists/9328, archived at https://tgstat.com/channel/@dead_terrorists/9328 and also available at B.M., @ireallyhateyou, Tweet (8:05 pm, 14 July 2024), <https://x.com/ireallyhateyou/status/1812549109028463005>.

Support for the starvation of Palestinians and settlement of Gaza

27. Israeli civilians conduct routine protests, which sometimes take the form of raves or parties, with “inflatables, cotton candy, and popcorn and slushies”, to block the delivery of life-saving humanitarian aid to the starving population of Gaza.¹⁸⁸ Israeli civilians have also entered the Gaza perimeter unimpeded by Israeli soldiers in marches advocating for Israeli settlement,¹⁸⁹ and to plough the land and to establish a symbolic ‘settlement’ as harbingers of the future Israeli settlement of Gaza.¹⁹⁰ South Africa is unaware of any prosecutions arising from such protests or rallies, which appear to be facilitated by the Israeli military and police.¹⁹¹ In October 2024, at the start of Israel’s major assault and tightened siege and starvation of northern Gaza, for the first time since October 2023, the Likud Party — the major party in government — itself issued an invitation to a settlement conference next to Gaza, titled “Preparing to Settle Gaza.”¹⁹² The Nachala settlement movement stated the event was “not just a theoretical conference, but a practical exercise and preparation for renewed settlement in Gaza”.¹⁹³

Incitement to genocide in song

28. Incitement to the genocide of Palestinians has also become mainstream in Israeli popular culture, with genocidal songs and anthems routinely topping the charts. Song lyrics include: ‘May your village burn’ (as addressed above),¹⁹⁴ and calls on the Israeli army to give “no warnings” and to “shoot . . . like its raining rockets . . . until Gaza will be erased”.¹⁹⁵ One song with over 2.4 million views on YouTube includes the following lyrics:

“We entered Gaza, we’ll exit only when nothing remains . . . It’ll be difficult for you to see the pictures from Gaza. You don’t have any neighbourhoods left in Gaza, you can’t drink anymore in Gaza. You won’t get to bury the bodies in Gaza. The IDF is coming at you, the entire squad, houses falling around you non-stop . . . [G]ood riddance you whores, and all your Fatmas look like [vomiting sound]... like putas [Spanish: ‘whores’] . . . you don’t have any bread or water. Oh, and you don’t have any house.”¹⁹⁶

¹⁸⁸ “Gaza aid delivery hampered by Israeli attacks on police, rising chaos”, *The Washington Post* (22 February 2024), <https://www.washingtonpost.com/world/2024/02/22/gaza-aid-deliveries-looting-police-hamas/>; “Israeli activists block aid trucks from entering Gaza”, *Middle East Eye* (7 February 2024), <https://www.youtube.com/shorts/pS7SGFnAmRk>; Igal Malka, @igal_malka_5G, Tweet (2:19 pm, 6 February 2024), https://twitter.com/igal_malka_5G/status/1754842129619108068.

¹⁸⁹ Victory [in] Gaza. End., @azasof, Tweet (10:24 pm, 29 February 2024), <https://twitter.com/azasof/status/1763299108654055463>.

¹⁹⁰ Oren Ziv, “Israeli settlers cross into Gaza, build ‘symbolic’ outpost”, *+972 Magazine* (1 March 2024), <https://www.972mag.com/israeli-settlers-gaza-outpost-erez-crossing/>.

¹⁹¹ Loveday Morris, “Young Israelis block aid to Gaza while IDF soldiers stand and watch”, *The Washington Post* (10 February 2024), <https://www.washingtonpost.com/world/2024/02/10/gaza-aid-blockade-protest-kerem-shalom/>; “Lorenzo Tondo and Quique Kierszenbaum, “Israeli soldiers and police tipping off groups that attack Gaza aid trucks”, *The Guardian* (21 May 2024), <https://www.theguardian.com/world/article/2024/may/21/israeli-soldiers-and-police-tipping-off-groups-that-attack-gaza-aid-trucks>; Bar Peleg and Eden Solomon, “‘Spill It Onto the Road’: How Right-wing Israeli Activists Are Organizing to Block Aid Trucks to Gaza”, *Haaretz* (20 May 2024), <https://www.haaretz.com/israel-news/2024-05-20/ty-article/.premium/how-right-wing-israeli-activists-are-organizing-to-block-aid-trucks-to-gaza/0000018f-965e-d35f-a1df-dfd8e7d0000>. See also para. 31.

¹⁹² Noa Shpigel, “Netanyahu’s Likud Party Issues Invitation to Event Titled ‘Preparing to Settle Gaza’”, *Haaretz* (16 October 2024), <https://www.haaretz.com/israel-news/2024-10-16/ty-article/.premium/netanyahus-likud-party-issues-invitation-to-event-titled-preparing-to-settle-gaza/00000192-95b6-d9c2-a7f3-9db676f40000>.

¹⁹³ *Ibid.*

¹⁹⁴ See also e.g., “Video of Kobi Peretz with soldiers”, *OfekCentre* (17 November 2023), <https://www.youtube.com/watch?v=xcH2o4c5KZY>.

¹⁹⁵ “Raskai x Eliad Sapir x Tali Paz – Shagar”, *Raskai* (23 November 2023), <https://web.archive.org/web/20240114024922/https://www.youtube.com/watch?v=sfZOJYA7EOg> (removed by YouTube). Available on Spotify at: <https://open.spotify.com/album/0wW3GGnBPLpOGxndY61hZD?highlight=spotify:track:1hmYRXWKRm4IIHEZ3GS7SH>. Also available at B.M., @ireallyhateyou, Tweet (2:38 pm, 12 March 2024), <https://x.com/ireallyhateyou/status/1767530549202039194>.

¹⁹⁶ “Who’s crazy, duda gang”, *duda gang* (17 November 2023) (2,590, 775 views) <https://www.youtube.com/watch?v=Rob85tu7PVY>. Also available at B.M., @ireallyhateyou, Tweet (3:15 pm, 16 March 2024), <https://twitter.com/ireallyhateyou/status/1768989430084227090>.

29. An Israeli cover of a song by Palestinian artists Daboor and Shabjdeed has changed its lyrics to dehumanise Palestinians:

“70 [male] virgins await. Ha. Shooting and running, you're like cockroaches, so don't cry now, when the exterminators arrive. Taking down buildings, evacuating civilians, because the next Nova, [is] in your territories[.] Anyone who gets uppity, we will launch to the skies. For each one of us, we'll take down thousands. What did you think would happen, we wouldn't come prepared? And it's a shame that this is the only way you understand . . . A tooth for a tooth, then you'll get the message. For every house you destroyed, we'll destroy ten of yours. The Middle East — from Yemen to Damascus There's nowhere to go, it's time to close the deal. It's Gaza or mush, I'm done, fuck it [Arabic] You opened your mouth, so we brought the muzzle. Forget or forgive, forget that fantasy. The only solution is that you change the flag.”¹⁹⁷

30. Another song which topped the Israeli charts for five weeks includes the lyrics: “I swear there will be no forgiveness, you sons of Amalek”,¹⁹⁸ and “[w]ait for us to drop rain on you, Kachbot [curse word in Moroccan]” as “every dog has its day comes”. The more recent release of a ‘bonus’ verse for the song, which includes “A bunch of cowfuckers. We destroyed Gaza while you were fucking goats. Sons of whores you don’t get the hints . . . writing names on shells. . . [t]urning Gaza into a parking lot!”¹⁹⁹— has been performed for Israeli schoolchildren.²⁰⁰ A previous song called “The Friendship Song” sung by Israeli children included the genocidal lyrics: “[i]n another year, there will be nothing there . . . within a year we will annihilate everyone”.²⁰¹ Such songs are repeatedly played as the soundtrack to videos posted on social media by Israeli soldiers, firing missiles into Gaza, filming the ruins of Gaza, and recording their destruction of buildings — including schools.²⁰² Their role in inciting the genocide of Palestinians in Gaza is clear.

Failure by Israel to prevent, prosecute or punish incitement to genocide

31. The impunity of those responsible for making genocidal statements is itself demonstrative of Israel’s continuing failure to prevent or punish incitement to genocide against Palestinians in Gaza, as it is duty bound to do under the Genocide Convention and pursuant to binding orders by the International Court of Justice. It is to be contrasted with Israel’s approach towards Palestinian citizens of Israel and Palestinian residents of East Jerusalem alleged to have engaged in incitement to terror or violence, including for expressions of sympathy for Palestinians in Gaza or sharing news about Gaza. In the first six weeks from the start of the escalation alone, over 130 people were arrested and detained, and at least 76 indicted, including in some

¹⁹⁷ See Younis Tirawi, @ytirawi, Tweet (12:34 pm, 27 July 2024), <https://x.com/ytirawi/status/1816965332952555683>.

¹⁹⁸ “‘Harbu Darbu’: the war song of the creators of the hit ‘Small Bag’ [Tik Katan]”, *Ynet* (14 November 2023), <https://www.ynet.co.il/entertainment/article/rk5xh6en6>. See “Why the No. 1 song in Israel represents a radical shift in Israeli pop music”, *Forward* (4 December 2023), <https://forward.com/culture/572004/israel-pop-music-number-one-song-harbu-darbu-ness-stilla>. Regarding popularity and response by army: “We have been waiting for this song!” said one active reservist. “I have changed my sadness to anger and found great pride because of you.”

¹⁹⁹ B.M., @ireallyhateyou, Tweet (2:45 pm, 24 January 2024), <https://twitter.com/ireallyhateyou/status/1750137710180749736>.

²⁰⁰ B.M., @ireallyhateyou, Tweet (12:50 pm, 24 March 2024), <https://twitter.com/ireallyhateyou/status/1771670813801926916>.

²⁰¹ Sophia Khatenskova, “Fact-check: Did Israeli children really sing about annihilating everyone in Gaza?”, *Euronews* (27 November 2023), <https://www.euronews.com/my-europe/2023/11/27/fact-check-did-israeli-children-really-sing-about-annihilating-everyone-in-gaza>.

²⁰² “Stopped Counting Erased Neighborhoods”, *TikTok Genocide* (9 December 2023), <https://tiktokgenocide.com/uploads/stopped-counting-erased-neighborhoods>; mesayat7, @mesayat7, TikTok (26 December 2023), <https://www.tiktok.com/@mesayat7/video/7317040508352597256>; tal_nagar_stand_up, @tal_nagar_stand_up, TikTok (23 January 2024), https://www.tiktok.com/@tal_nagar_stand_up/video/7327220185646124306; Davidttzayv, @davidttzayv, TikTok (28 November 2023), <https://www.tiktok.com/@davidttzayv/video/7306576825944214786>; urielbenzvi, @urielbenzvi, TikTok (25 February 2024), <https://www.tiktok.com/@urielbenzvi/video/7339622226938891538>.

instances for what appears to constitute protected speech under the International Covenant on Civil and Political Rights ('ICCPR') to which Israel is a party.²⁰³ By 27 March 2024 401 individuals had been arrested for speech-related offences, and by 1 May 2024, 162 indictments had been filed.²⁰⁴ Examples include the arrest of a protester for holding a sign stating "Stop the Genocide", asserted to be an "inciting slogan . . .";²⁰⁵ and the high-profile arrest, interrogation, ill-treatment²⁰⁶ and conditional bail of Hebrew University Professor Nadera Shalhoub-Kevorkian, for alleged "severe incitement against the State of Israel", consisting *inter alia* of "statements made against Zionism" and "claims that Israel is currently committing genocide in Gaza".²⁰⁷ Many of the arrests and indictments are for statements made on social media.²⁰⁸ Palestinians convicted for such speech-related offences have often been sentenced to imprisonment and are reportedly subject to inhumane and degrading treatment.²⁰⁹ At the same time, Israel's State Attorney has advised the Attorney General *against* any criminal investigation of public incitement to genocide of public figures for some of the statements listed above.²¹⁰

Required Urgent Action

32. This widespread incitement pervading Israeli society requires urgent action from the international community.²¹¹ This rhetoric has escalated, unsanctioned by Israel, notwithstanding the International Court of Justice's reiteration in its Orders that Israel "must take all measures" to prevent and punish direct and public incitement.²¹²

²⁰³ Adalah, *Interrogations, Arrests, and Indictments of Palestinian Citizens of Israel since 7 October* (15 November 2023), <https://www.adalah.org/en/content/view/10959>; International Covenant on Civil and Political Rights (adopted 16 December 1966, entered into force 23 March 1976) 999 UNTS 171 ('ICCPR'), Articles 19. Israel ratified the ICCPR on 3 October 1991.

²⁰⁴ Adalah, *Adalah's report to the UN Special Rapporteur (SR) on Freedom of Opinion and Expression: Threats to Palestinians' FoE rights in Israel post-7 October 2023* (30 June 2024), https://www.adalah.org/uploads/uploads/submission_SR_freedom_of_opinion_and_expression.pdf; Adalah, *Persecuted for Protesting against the War on Gaza: The Cases of Muhammad Jabareen and Ahmed Khalefa - Human Rights Defenders in Prolonged Detention and Indicted for Incitement in Israel* (2 June 2024), <https://www.adalah.org/en/content/view/11124>.

²⁰⁵ "A protester in Haifa who waved a sign with the words 'stop the genocide' will spend a night in detention", *Haaretz* (14 March 2024), https://www.haaretz.co.il/news/politics/war-2023/2024-03-14/ty-article-live/0000018e-3a05-d2fd-a1fe-3ff56af90000?liveBlogItemId=1611606096&utm_source=site&utm_medium=button&utm_campaign=live_blog_item#1611606096.

²⁰⁶ Emma Graham-Harrison and Quirke Kierszenbaum, "'Political arrest' of Palestinian academic in Israel is civil liberties threat, say lawyers", *The Guardian* (26 April 2024), <https://www.theguardian.com/world/2024/apr/26/political-arrest-palestinian-academic-nadera-shalhoub-kevorkian-israel-civil-liberties-threat>.

²⁰⁷ Nicola Perugini, @PeruginiNic, Tweet (9:23 pm, 19 April 2024), <https://twitter.com/PeruginiNic/status/1781403281715064954>.

²⁰⁸ Adalah, *Interrogations, Arrests, and Indictments of Palestinian Citizens of Israel since 7 October* (15 November 2023), <https://www.adalah.org/en/content/view/10959>; Loveday Morris, "Israel's free speech crackdown: 'War inside of a war'", *The Washington Post* (12 November 2023), <https://www.washingtonpost.com/world/2023/11/12/israel-free-speech-arrests-hamas/>.

²⁰⁹ The Public Committee Against Torture in Israel, Adalah -The Legal Center for Arab Minority Rights in Israel, HaMoked - Center for the Defence of the Individual and Physicians for Human Rights Israel, *Urgent appeal to the UN Special Rapporteur on torture, cruel, inhumane or degrading treatment or punishment regarding the systematic torture and inhuman treatment of Palestinian detainees in Israel prison facilities since October 7, 2023* (16 February 2024), https://www.omct.org/site-resources/files/Submission_SR_Torture_final-15.2.24.pdf, p. 3. See also, the *Law on Combating Terrorism, 2016* — under which many Palestinians are charged — can carry a five-year prison sentence: *Law on Combating Terrorism, 2016*, Art. 24(B), https://www.gov.il/BlobFolder/dynamiccollectorresultitem/counter-terrorism-law-2016-english/he/legal-docs_counter_terrorism_law_2016_english.pdf.

²¹⁰ "State attorney clarifies no ongoing probes against Eyal Golan, others for incitement", *Times of Israel* (20 August 2024), <https://www.timesofisrael.com/report-state-attorney-sought-probe-of-likud-mk-for-gaza-incitement/>; Rachel Fink, "'Wipe Out Gaza': State Prosecutor Advises Against Probing Israeli Megastar Eyal Golan Over Incitement", *Haaretz* (19 August 2024), <https://www.haaretz.com/israel-news/2024-08-19/ty-article/.premium/state-prosecutor-mulls-probe-of-israeli-megastar-eyal-golan-for-calling-to-wipe-gaza-out/00000191-6a82-dda8-af9b-6fe244840000>.

²¹¹ UN OCHA, *Gaza Strip: States are obliged to prevent crimes against humanity and genocide, UN Committee stresses* (21 December 2023), <https://www.ohchr.org/en/press-releases/2023/12/gaza-strip-states-are-obliged-prevent-crimes-against-humanity-and-genocide>.

²¹² *Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (South Africa v. Israel)*, Order of 26 January 2024, <https://www.icj-cij.org/sites/default/files/case-related/192/192-20240126-ord-01-00-en.pdf>, p. 25, para. 86(3).

ANNEX IV

PUBLIC STATEMENTS EVIDENCING CONTEMPT FOR THE INTERNATIONAL COURT OF JUSTICE AND THE UNITED NATIONS BY ISRAELI GOVERNMENTAL OFFICIALS

1. Israel and officials in positions of the highest responsibility within the Israeli government — including members of the Israeli Security Cabinet responsible for decision-making in relation to Israel's military assault on Gaza — have openly and repeatedly expressed their contempt for the International Court of Justice's ('ICJ') and its Orders in the case concerning the *Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (South Africa v. Israel)*,¹ as well as for the United Nations more generally, and the International Criminal Court ('ICC'). Israel's assault on Gaza is now accompanied by its assault on the international rule of law.

2. Its public contempt for the ICJ's Orders in word has been further accompanied by the Israeli military's open defiance in deed.² Israel's statements demonstrating contempt are further being made against the background of Israel's continuing further affront to the United Nations, by *inter alia* preventing the access of United Nations personnel and special procedures mandate-holders to Palestine in general and to Gaza in particular, including the United Nations Special Rapporteur on Palestine,³ the Commissioner-General of the United Nations Relief and Works Agency for Palestine Refugees in the Near East ('UNRWA'),⁴ the United Nations Office for the High

¹ *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, <https://www.icj-cij.org/sites/default/files/case-related/192/192-20240126-ord-01-00-en.pdf>.

² See e.g. United Nations General Assembly ('UNGA'), *Illegal Israeli actions in Occupied East Jerusalem and the rest of the Occupied Palestinian Territory*, A/RES/ES-10/24 (18 September 2024), <https://undocs.org/A/RES/ES-10/24>, p. 5: "Demands that Israel comply without delay with all its legal obligations under international law, including as stipulated by the International Court of Justice, by, *inter alia* . . . Immediately complying with obligations under international law indicated in the respective provisional measures orders of the International Court of Justice in the case concerning the application of the Convention on the Prevention and Punishment of the Crime of Genocide (South Africa v. Israel); UN Human Rights Office of the High Commissioner ('UN OHCHR'), *'The international order is breaking down in Gaza': UN experts mark one year of genocidal attacks on Palestinians* (11 October 2024), <https://www.ohchr.org/en/statements/2024/10/international-order-breaking-down-gaza-un-experts-mark-one-year-genocidal>: "Provisional measures ordered by the International Court of Justice (ICJ) to prevent genocidal acts and preserve evidence of crimes committed in Gaza remain unfulfilled." See also Al Mezan Center for Human Rights, *As Israel's Genocide in Gaza Passes the One-Year Mark, International Inaction Fuels Renewed Wave of Genocidal Violence against Palestinians* (12 October 2024), <https://www.mezan.org/public/en/post/46551/As-Israel%E2%80%99s-Genocide-in-Gaza-Passes-the-One-Year-Mark-International-Inaction-Fuels-Renewed-Wave-of-Genocidal-Violence-against-Palestinians>; Palestinian Centre for Human Rights ('PCHR'), *One Month after the ICJ Order, Israel Continues its 142 Day-Long Genocide on Gaza* (26 February 2024), <https://pchrgaza.org/one-monthafter-the-icj-order-israel-continues-its-142-day-long-genocide-on-gaza/>; Airwars, *Two weeks under scrutiny: Patterns of harm reported in Gaza following ICJ ruling* (26 February 2024), <https://airwars.org/news/two-weeks-under-scrutiny-patterns-of-harm-reported-in-gaza-following-icj-ruling/>; Amnesty International, *Gaza: Israel failing to comply with ICJ order on humanitarian aid* (26 February 2024), <https://www.amnesty.org.uk/press-releases/gaza-israel-failing-comply-icj-order-humanitarian-aid>; Human Rights Watch ('HRW'), *Israel not complying with World Court Order in Genocide Case* (26 February 2024), <https://www.hrw.org/news/2024/02/26/israel-not-complying-world-court-order-genocide-case>; Global Centre for the Responsibility to Protect, *Atrocity Alert No. 413: Israel and the Occupied Palestinian Territory, DR Congo and Libya* (9 October 2024), <https://www.globalr2p.org/publications/atrocity-alert-no-413/>; Physicians for Human Rights, *1000 Attacks on Health Care in the Occupied Palestinian Territories (OPT) Devastate Health System, Demand Accountability: PHR* (2 August 2024), <https://phr.org/news/1000-attacks-on-health-care-in-the-occupied-palestinian-territories-opt-devastate-health-system-demand-accountability-phr/>; HRW, *Israel / Palestine: A year of Horror* (6 October 2024), <https://www.hrw.org/news/2024/10/06/israel-palestine-year-horror>; Oxfam and 37 other humanitarian organisations, *Urgent joint statement: Northern Gaza is being erased – global leaders must act now to end Israel's atrocities* (15 October 2024), <https://www.oxfam.org/en/press-releases/urgent-joint-statement-northern-gaza-being-erased-global-leaders-must-act-now-end>.

³ UN OHCHR, *Israel's symbolic 'ban' must not distract from atrocity crimes in Gaza: UN expert* (15 February 2024), <https://www.ohchr.org/en/press-releases/2024/02/israels-symbolic-ban-must-not-distract-atrocity-crimes-gaza-un-expert>.

⁴ Philippe Lazzarini, @UNLazzarini, Tweet (6:08 pm, 5 May 2024), <https://x.com/UNLazzarini/status/1787152454867378687>; UNRWA, #Gaza: The Israeli Authorities continue to deny humanitarian access to the United Nations (5 May 2024), <https://www.unrwa.org/newsroom/official-statements/gaza-israeli-authorities-continue-deny-humanitarian-access-united-nations>.

Commissioner of Human Rights ('UN OHCHR'),⁵ and the United Nations Commission of Inquiry.⁶ Israel also continues to deny access and visas to journalists and human rights monitors,⁷ as well as NGOs and aid agencies — including UN agencies,⁸ and independent investigators — such as the ICC's Office of the Prosecutor ('OTP'),⁹ significantly hindering the preservation of essential evidence and the scaling up of lifesaving aid to Gaza and constituting a violation of all three of the Orders of the International Court of Justice. Israel's consistent and wilful interference with the United Nations or other neutral observers affecting their ability to safely perform their functions, or to prevent their observations of crimes being committed, is consistent with its refusal to acknowledge or comply with its identified duties under the Genocide Convention.¹⁰

3. Since the beginning of October 2024, Israel has escalated its attack on the United Nations Refugee and Works Agency for Palestine Refugees in the Near East ('UNRWA'), with the dismantlement of all UNRWA's operations in the occupied Palestinian territory planned by at least the end of January 2024.¹¹ On 3 November 2024 Israel formally notified the United Nations that it would terminate cooperation

⁵ UN OHCHR, *Geneva Press Briefing: OCHA, UNICEF, OHCHR, WHO, UN WOMEN* (7 May 2024), <https://webtv.un.org/en/asset/k1g/k1g9eajpmk> [43:10]-[44:31]. See also UN OHCHR, *Update Report: Six-month update report on the human rights situation in Gaza: 1 November 2023 to 30 April 2024* (8 November 2024), <https://www.ohchr.org/sites/default/files/documents/countries/opt/20241106-Gaza-Update-Report-OPT.pdf>; "The High Commissioner has asked Israel for access to Israel and the Occupied Palestinian Territory (OPT) in order to investigate human rights violations on and since 7 October 2023, pursuant to its mandate, which so far has not been granted".

⁶ UNGA, *Report of the Independent International Commission of Inquiry on the Occupied Palestinians Territory, including East Jerusalem, and Israel*, A/79/232 (11 September 2024), <https://undocs.org/A/79/232>, para. 2: "The Commission sent nine requests for information and access to the Government of Israel, two requests for information to the State of Palestine and one request for information to the Ministry of Health in Gaza. The State of Palestine and the Ministry of Health in Gaza provided information. No response was received from Israel."

⁷ The Foreign Press Association, *Statement by the Foreign Press Association. The FPA demands immediate entrance to Gaza* (10 September 2024), <https://foreignpressassociation.online/2024/09/10/statement-by-the-board-of-the-foreign-press-association-the-fpa-demands-immediate-entrance-to-gaza-september-10-2024/>; Francesca Albanese, UN Special Rapporteur oPt, @FrancescaAlbs, Tweet (12:20 am, 29 April 2024), <https://x.com/FrancescaAlbs/status/1784709362176467187>; "Supreme Court rejects petition demanding foreign press be allowed freely into Gaza", *The Times of Israel* (9 January 2024), https://www.timesofisrael.com/liveblog_entry/supreme-court-rejects-fpa-petition-demanding-foreign-press-be-allowed-freely-into-gaza/.

⁸ See e.g., Michelle Nichols, "UN says Israel will not renew visa for top aid official", *Reuters* (1 December 2023), <https://www.reuters.com/world/middle-east/un-says-israel-will-not-renew-visa-top-aid-official-2023-12-01/>; Amira Hass, "Israel Blocks Work Visas From International Aid NGO Workers in West Bank and Gaza", *Haaretz* (25 February 2024), https://www.haaretz.com/israel-news/2024-02-25/ty-article/.premium/israel-blocks-work-visas-from-international-aid-ngo-workers-in-west-bank-and-gaza/0000018d-e195-df79-a5cd-e1bfa8600000?utm_source=twitter&utm_medium=social; Emma Farge, "Dozens of stalled Israeli visas seen hindering Gaza aid efforts", *Reuters* (28 March 2024), <https://www.reuters.com/world/middle-east/dozens-stalled-israeli-visas-seen-hindering-gaza-aid-efforts-2024-03-28/>; UNRWA, @UNRWA, Tweet (2:54 pm, 17 September 2024), <https://x.com/UNRWA/status/1836025843581071519>; Noa Shpigel, "Israel Stopped Issuing Visas to International Aid Organizations, National Security Council Admits", *Haaretz* (13 September 2024), <https://www.haaretz.com/israel-news/2024-09-13/ty-article/.premium/israeli-government-stopped-issuing-visas-to-international-aid-organizations-nsc-admits/00000191-ebc8-d1c1-adbf-ffa97de0000>.

⁹ António Guterres, @antonioguterres, Tweet (9:44 pm, 30 April 2024), <https://x.com/antonioguterres/status/1785394742391402660>; "Exclusive: ICC Chief Prosecutor explains why he's seeking arrest warrants for leaders of Hamas and Israel", *CNN* (20 May 2024), <https://edition.cnn.com/videos/tv/2024/05/20/amanpour-icc-karim-khan-arrest-warrants-hamas-netanyahu.cnn> [4:50-5:30]: "it's a very complex situation, we've not been allowed access into Gaza by the Israeli authorities".

¹⁰ See also e.g. Committee on the Elimination of Racial Discrimination ('CERD'), *Decision on follow-up to the declaration on the prevention of genocide: indicators of patterns of systematic and massive racial discrimination*, CERD/C/67/1 (14 October 2005), https://www.ohchr.org/sites/default/files/Documents/Press/indicators_for_genocide.pdf, p. 2, noting that that the "the assessment of" specific indicators of patterns of systematic and massive racial discrimination and their significance "for the purpose of predicting genocide" is mitigated by the "[P]resence of external mitigating factors such as the United Nations or other recognized invited third parties" — which Israel is obstructing.

¹¹ See Israel, *Bill for the Cessation of UNRWA Activities, 5784–2024* and *Bill for the Cessation of UNRWA Activities in the Territory of the State of Israel, 5784–2024* [unofficial translation by Adalah], https://www.adalah.org/uploads/uploads/UNRWA_bills_translation_October_2024.pdf; UNRWA, *Letter from UNRWA Commissioner General Philippe Lazzarini to the President of the United Nations General Assembly Mr Philémon Yang* (29 October 2024), <https://www.unrwa.org/newsroom/official-statements/letter-unrwa-cg-philippe-lazzarini-president-ga-philemon-yang>; António Guterres, @antonioguterres, Tweet (3:58 am, 29 October 2024), <https://x.com/antonioguterres/status/1851081213412532374>.

with UNRWA.¹² Statements inciting against UNRWA are contained in Annex I and Annex III.

4. It is clear from both Israel's words and deeds that Israel has no intention to seek to comply with the ICJ's Provisional Measures ordered so far, or with its other applicable international legal obligations relating to the rights of Palestinians. Israel's clear statements and its actions in defiance of the ICJ's binding orders; its statements inciting against the United Nations, its agencies, and its officials; and its statements demonstrating contempt for the International Criminal Court; further illustrate the imperative necessity for the international community to act urgently to ensure compliance by Israel with those Orders and with its broader commitments under international law, and to protect Palestinians in Gaza from further death, harm and destruction. Such action is required not only because of the peremptory norms protected by the Genocide Convention, but also by the resolutions of the General Assembly of the United Nations.¹³

The Provisional Measures Orders Indicated against Israel by the International Court of Justice

5. The International Court of Justice has issued three binding Orders against Israel in South Africa's Case concerning the *Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (South Africa v. Israel)* aimed at protecting, from "irreparable harm", the rights implicated in the case, including "the right of the Palestinians in Gaza to be protected from acts of genocide and related prohibited acts identified in Article III" of the Genocide Convention, in light of the "real and imminent risk that irreparable prejudice will be caused to the rights found by the Court to be plausible, before it gives its final decision".¹⁴ South Africa has been compelled to return to the Court on each successive occasion in light of Israel's continuing, egregious breaches of the Genocide Convention against Palestinians in Gaza.

6. The ICJ's first **Order of 26 January 2024 ('January Order')** indicated the following six provisional measures binding on Israel:¹⁵

"1. The State of Israel shall, in accordance with its obligations under the Convention on the Prevention and Punishment of the Crime of Genocide, in relation to Palestinians in Gaza, take all measures within its power to prevent the commission of all acts within the scope of Article II of this Convention, in particular:

- (a) killing members of the group;
- (b) causing serious bodily or mental harm to members of the group;
- (c) deliberately inflicting on the group conditions of life calculated to bring about its physical destruction in whole or in part; and

¹² Danny Danon, @dannyanon, Tweet (6:18 am, 4 November 2024), <https://x.com/dannyanon/status/1853290585878081801>.

¹³ See UNGA, *Illegal Israeli actions in Occupied East Jerusalem and the rest of the Occupied Palestinian Territory*, A/RES/ES-10/24 (18 September 2024), <https://undocs.org/A/RES/ES-10/24>: "Demands that Israel comply without delay with all its legal obligations under international law, including as stipulated by the International Court of Justice, by, in ter alia . . . (f) Immediately complying with obligations under international law indicated in the respective provisional measures orders of the International Court of Justice in the case concerning the application of the Convention on the Prevention and Punishment of the Crime of Genocide (South Africa v. Israel) in relation to the right of the Palestinian people in the Gaza Strip to be protected from all acts within the scope of articles II and III of the Convention."

¹⁴ *South Africa v. Israel, Provisional Measures, Order of 26 January 2024*, paras. 66 and 74; *South Africa v. Israel, Provisional Measures, Order of 28 March 2024*, <https://www.icj-cij.org/sites/default/files/case-related/192/192-20240328-ord-01-00-en.pdf>, para. 27, and 40; *South Africa v. Israel, Provisional Measures, Order of 24 May 2024*, <https://www.icj-cij.org/sites/default/files/case-related/192/192-20240524-ord-01-00-en.pdf>, paras. 32, 34 and 47.

¹⁵ *South Africa v. Israel, Provisional Measures, Order of 26 January 2024*, pp. 24-26, para. 86.

- (d) imposing measures intended to prevent births within the group;
2. The State of Israel shall ensure with immediate effect that its military does not commit any acts described in point 1 above;
 3. The State of Israel shall take all measures within its power to prevent and punish the direct and public incitement to commit genocide in relation to members of the Palestinian group in the Gaza Strip;
 4. The State of Israel shall take immediate and effective measures to enable the provision of urgently needed basic services and humanitarian assistance to address the adverse conditions of life faced by Palestinians in the Gaza Strip;
 5. The State of Israel shall take effective measures to prevent the destruction and ensure the preservation of evidence related to allegations of acts within the scope of Article II and Article III of the Convention on the Prevention and Punishment of the Crime of Genocide against members of the Palestinian group in the Gaza Strip;
 6. The State of Israel shall submit a report to the Court on all measures taken to give effect to this Order within one month as from the date of this Order”.
7. On 16 February 2024, the ICJ clarified the Order of 26 January 2024 and reaffirmed its applicability, stating as follows (‘February Decision’):¹⁶

“The Court notes that the most recent developments in the Gaza Strip, and in Rafah in particular, ‘would exponentially increase what is already a humanitarian nightmare with untold regional consequences’, as stated by the United Nations Secretary-General (Remarks to the General Assembly on priorities for 2024 (7 Feb. 2024)).

This perilous situation demands immediate and effective implementation of the provisional measures indicated by the Court in its Order of 26 January 2024, which are applicable throughout the Gaza Strip, including in Rafah, and does not demand the indication of additional provisional measures.

The Court emphasizes that the State of Israel remains bound to fully comply with its obligations under the Genocide Convention and with the said Order, including by ensuring the safety and security of the Palestinians in the Gaza Strip.”

8. The ICJ’s second **Order of 28 March 2024 (‘March Order’)** reaffirmed the above provisional measures indicated in the January Order, and indicated the following additional three provisional measures binding on Israel:¹⁷

“2. The State of Israel shall, in conformity with its obligations under the Convention on the Prevention and Punishment of the Crime of Genocide, and in view of the worsening conditions of life faced by Palestinians in Gaza, in particular the spread of famine and starvation:

- (a) Take all necessary and effective measures to ensure, without delay, in full co-operation with the United Nations, the unhindered provision at scale by all concerned of urgently needed basic services and humanitarian assistance, including food, water, electricity, fuel, shelter, clothing, hygiene and sanitation requirements, as well as medical supplies and medical care to Palestinians throughout Gaza, including by increasing the capacity and number of land crossing points and maintaining them open for as long as necessary;

¹⁶ *South Africa v. Israel, Decision of the Court on South Africa’s request for additional provisional measures of 16 February 2024, (‘February Decision’)*, <https://www.icj-cij.org/sites/default/files/case-related/192/192-20240216-pre-01-00-en.pdf>.

¹⁷ *South Africa v. Israel, Provisional Measures, Order of 28 March 2024*, pp. 12-13, paras. 48 and 51.

- (b) Ensure with immediate effect that its military does not commit acts which constitute a violation of any of the rights of the Palestinians in Gaza as a protected group under the Convention on the Prevention and Punishment of the Crime of Genocide, including by preventing, through any action, the delivery of urgently needed humanitarian assistance;

3. . . . [T]he State of Israel shall submit a report to the Court on all measures taken to give effect to this Order, within one month as from the date of this Order”.

9. The ICJ’s third **Order of 24 May 2024** (**‘May Order’**) again reaffirmed all previous provisional measures, ordering that they “be immediately and effectively implemented”, and indicated the following additional four provisional measures binding on Israel:¹⁸

“2. The State of Israel shall, in conformity with its obligations under the Convention on the Prevention and Punishment of the Crime of Genocide, and in view of the worsening conditions of life faced by civilians in the Rafah Governorate:

- (a) Immediately halt its military offensive, and any other action in the Rafah Governorate, which may inflict on the Palestinian group in Gaza conditions of life that could bring about its physical destruction in whole or in part;
- (b) Maintain open the Rafah crossing for unhindered provision at scale of urgently needed basic services and humanitarian assistance; and
- (c) Take effective measures to ensure the unimpeded access to the Gaza Strip of any commission of inquiry, fact-finding mission or other investigative body mandated by competent organs of the United Nations to investigate allegations of genocide;

3. . . . [T]he State of Israel shall submit a report to the Court on all measures taken to give effect to this Order, within one month as from the date of this Order.”

10. Israel has not complied with any of the substantive provisional measures indicated against it.¹⁹ It has done so while at the same aggravating and intensifying its military operations in Gaza, destroying the Palestinian group in Gaza, and overtly proclaiming its contempt for the ICJ and its orders.

Israel’s Intention not to Abide by the Orders of the Court

11. Even before the International Court of Justice’s first Order indicating provisional measures of protection against Israel, on 26 January 2024, Israeli officials indicated that they would not comply with any ruling by the Court. On the day after the oral hearings at the Court, 13 January 2024, the **Israeli Prime Minister Benjamin Netanyahu** claimed in a statement published by the Prime Minister’s Office “Nobody will stop us — not The Hague, not the axis of evil and not anybody else. The hypocritical onslaught at The Hague against the state of the Jews that arose from the ashes of the Holocaust, at the behest of those who came to perpetrate another Holocaust against the Jews — is a moral low point in the history of nations.”²⁰

¹⁸ *South Africa v. Israel, Provisional Measures, Order of 24 May 2024*, pp. 14-15, para. 57.

¹⁹ See para. 2, fn. 2.

²⁰ Israeli Prime Minister’s Office, *Statement by PM Netanyahu* (13 January 2024), <https://www.gov.il/en/pages/spoke-press130424>. See also then-Spokesperson Eylon Levy’s interview on the BBC, 10 January 2024: Eylon Levy, @EylonALevy, Tweet (6:42 pm, 10 January 2024), <https://x.com/EylonALevy/status/1745139093732790485>: “Tomorrow, the State of Israel will appear before the International Court of Justice to dispel South Africa’s absurd blood libel, as Pretoria gives political and legal cover to the Hamas Rapist Regime.”

Israel's Intention Not to Comply with the January Order

12. Israeli Ministers — including members of Israel's Security Cabinet and War Cabinet responsible for Israel's conduct of military operations in Gaza — immediately publicly indicated their contempt for the Court's January Order:

- On 26 January 2024, the date of the Court's January Order, in a formal statement in response, **Prime Minister of Israel, Benjamin Netanyahu** called the Court's failure to reject South Africa's claim "a mark of disgrace that will not be erased for generations".²¹ The next day, in a statement issued by the Ministry of Foreign Affairs, he stated that there was "no greater absurdity than what occurred yesterday" in reference to the Court's Order,²² stating that the "very willingness in The Hague to discuss this ridiculous claim, the very fact that it was not rejected outright, proves that many in the world have not learned anything from the Holocaust."²³
- On 26 January 2024, the **then-Minister of Defence of Israel, Yoav Gallant**, also 'tweeted' that "[t]he ICJ went above and beyond, when it granted South Africa's antisemitic request to discuss the claim of genocide in Gaza",²⁴ adding in Hebrew that it "added sin to crime by not dismissing the petition outright".²⁵ He further stated: "Those who seek justice, will not find it on the leather chairs of the court chambers in The Hague — they will find it in the Hamas tunnels in Gaza, where 136 hostages are held, and where those who murdered our children are hiding."²⁶
- On the same day, **Former Minister of National Security of Israel (until 19 January 2025), Itamar Ben-Gvir** — a member of the Security Cabinet — tweeted "Hague Schmague" in response to the Order,²⁷ calling it "the decision of the antisemitic court" which "proves what we already knew: this Court is not seeking justice, but the persecution of the Jewish people."²⁸ In effect recognising the restraints placed by the Order on Israel, he stated: "[d]ecisions that endanger the continued existence of the State of Israel should not be obeyed, and we must continue crushing the enemy until absolute victory."²⁹
- On 27 January 2024, the **Ministry of Foreign Affairs of Israel**, led by then-Minister of Foreign Affairs Israel Katz, also a member of the Security Cabinet, issued an official statement in response to the January Order stating that "[t]he charge of genocide levelled against Israel at the International Court of Justice is false and outrageous", calling it "a shameful exploitation of the Genocide Convention that is not only wholly unfounded in fact and law, but morally repugnant."³⁰

²¹ Israel, Prime Minister's Office (Hebrew), *PM Netanyahu Comments On ICJ Verdict At The Hague* (26 January 2024), <https://www.gov.il/he/departments/news/spoke-hague260124>.

²² Israel, Ministry of Foreign Affairs, *Statement by PM Netanyahu* (27 January 2024), <https://www.gov.il/en/departments/news/statement-by-pm-netanyahu-27-jan-2024>.

²³ *Ibid.*

²⁴ Yoav Gallant, @yoavgallant, Tweet (3:52 pm, 26 January 2024), <https://twitter.com/yoavgallant/status/1750879386759241776>.

²⁵ Yoav Gallant, @yoavgallant, Tweet (3:30 pm, 26 January 2024), <https://twitter.com/yoavgallant/status/1750873882880360837>.

²⁶ Yoav Gallant, @yoavgallant, Tweet (3:52 pm, 26 January 2024), <https://x.com/yoavgallant/status/1750879390882316755>.

²⁷ Itamar Ben-Gvir, @itamarbengvir, Tweet (2:53 pm, 26 January 2024), <https://twitter.com/itamarbengvir/status/1750864446807794046>.

²⁸ Paz Abuhatzaira, "Ben Gvir responds to court's decision: 'Hague Schmague, they are continuing with the hypocrisy and persecution of the Jewish people'", *0404* (26 January 2024), <https://www.0404.co.il/?p=954729>.

²⁹ *Ibid.*

³⁰ Israel, Ministry of Foreign Affairs, *MFA statement following the ICJ decision on provisional measures* (26 January 2024), <https://www.gov.il/en/departments/news/mfa-statement-following-the-icj-decision-on-provisional-measures-26-jan-2024>.

- On 28 January 2024, **Israel's President, Isaac Herzog**, in a formal statement issued by the Israeli Ministry of Foreign Affairs, stated that the hearing of the Order for provisional measures on 26 January 2024 was a “blood libel that undermines the very values on which this court was established.”³¹
- On 29 January 2024, **Israel's Minister of Communications, Shlomo Karhi**, asserted that “[w]e must ensure that we are not tying the hands of the IDF soldiers, or God forbid, endangering them out of fear of what the world will say.”³² The same day, **Israel's Minister of Social Equality and the Advancement of Women May Golan** declared on a televised interview, also published on her X account, that “we have to be honest: the majority of the States in [the] Hague are Muslim countries . . . so I take no regard about what they are saying . . . You can't expect Muslim dictatorships to tell us what to do in a real democracy”.³³

13. Such views were broadly echoed by Members of the Knesset (‘MK’), including through the following ‘tweets’ challenging the legitimacy of the International Court of Justice:

- **Likud MK Dan Illouz** compared the ruling to “a post-World War II scenario where a court that includes some Nazi-supporting judges” relies “on statements from Nazi sympathizers (like UNRWA is to Hamas) [to] debate whether the United States and Britain committed genocide by freeing the world from Nazism.”³⁴
- **Likud MK Revital Gotliv** labelled the Court the “anti-semitic tribunal in The Hague”.³⁵
- **Likud MK Galit Distel Atbaryan**, commented that the provisional measures were acceptable “under one condition: that Joan Donoghue, the President of the International Court, will move to live in the first line of fire near Gaza with her daughters, granddaughters and sisters . . . I have a feeling that the day this happens she will be less interested in the humanitarian situation of the bloodthirsty uninvolved and more interested in building an atomic bunker for her and her family members.”³⁶
- **Religious Zionist Party MK Tzvi Sukkot**, stated that “[t]he Hague Tribunal is the political arm of [the] renewed murderous anti-Semitism” and “[a] circus of hypocrisy, evil, and hatred of Jews.”³⁷

14. In parallel, and despite the fact that the International Court of Justice rejected Israel's claim that its conduct in Gaza did not give rise to a real and imminent risk of irreparable harm to the right of Palestinians to be protected from genocidal acts, Israel has claimed that this Order — and subsequent orders — do not require it to alter its conduct in Gaza in any way. For example:

- On 31 January 2024, speaking at the United Nations Security Council meeting regarding the ICJ's January Order, **Israel's Deputy Ambassador to the United Nations, Jonathan Miller** stated that “[t]he egregious provisional measures requested by South Africa were effectively and summarily dismissed by the

³¹ Israel, Ministry of Foreign Affairs, *President Herzog addresses ICJ Ruling* (28 January 2024), <https://www.gov.il/en/departments/news/president-herzog-addresses-icj-ruling-28-jan-2024>.

³² Shlomo Karhi, @shlomo_karhi, Tweet (5:04 pm, 29 January 2024), https://twitter.com/shlomo_karhi/status/1751984756080640363.

³³ May Golan, @GolanMay, Tweet (6:31 pm, 29 January 2024), <https://twitter.com/GolanMay/status/1752006519619498481> [4:10 - 4:42].

³⁴ Dan Illouz, @dillouz, Tweet (2:32 pm, 26 January 2024), <https://twitter.com/dillouz/status/1750874246962630919>.

³⁵ Revital Gotliv, @TallyGotliv, Tweet (4:46 pm, 26 January 2024), <https://twitter.com/TallyGotliv/status/1750892850475044941>.

³⁶ MK Galit Distel Atbaryan, @GalitDistel, Tweet (3:04 pm, 26 January 2024), <https://twitter.com/GalitDistel/status/1750867185839247739>.

³⁷ Tzvi Sukkot, @tzvisuccot, Tweet (2:44 pm, 26 January 2024), <https://x.com/tzvisuccot/status/1750862179069198556>.

Court. The measures indicated relate, in practice, to existing legal obligations to which Israel is already committed.”³⁸

Israel's Intention not to Comply with the March Order

15. On 30 March 2024, in response to the Court's Order of 28 March 2024, the **Israeli Ministry of Foreign Affairs** released a statement falsely asserting that it “places no limitations on the amount of essential humanitarian aid that enters the Gaza Strip”, and that “South Africa has failed yet again in its cynical attempts to exploit the ICJ in order to undermine Israel's inherent right and obligation to defend its citizens from the ongoing Hamas attacks and to secure the release of hostages still held in Gaza in brutal captivity.”³⁹

Israel's Intention Not to Comply with the May Order

16. Prior to the ICJ's May Order in response to South Africa's request for the indication of further provisional measures against Israel, including a cessation of their military operations in Gaza,⁴⁰ various Israeli officials and spokespersons indicated that any Order would be ignored. By way of example:

- On 16 May 2024, responding to South Africa's oral pleadings at the Court, **Likud MK Revital Gotliv** in a ‘tweet’ labelled the Court the “anti-Semitic terror supporting court in The Hague”.⁴¹
- On 17 May 2024, the second day of the oral hearings on South Africa's request, Israel's then-**Minister of Foreign Affairs, Israel Katz**, also a member of the Security Cabinet, ‘tweeted’ that “[a]s our representatives told the South African legal team, who serve as the legal arm of Hamas murderers and rapists — repeating a lie a thousand times does not make it true. No force will prevent Israel from exercising its right to self-defense. We will continue to fight on the legal, political, and military fronts until all 132 of our hostages return to their loved ones.”⁴²
- On 23 May 2024, the evening before the International Court of Justice indicated additional provisional measures, in response to a question about whether a decision of the Court to cease hostilities would be accepted by Israel, **Deputy Speaker of the Knesset, Likud MK and Member of the Israeli Foreign Affairs and Security Committee Nissim Vaturi** stated on radio: “No matter what happens, we should stand our ground firmly and not be worried, ultimately we are always to blame”,⁴³ and that “[i]t is Israel's highest mission to return the hostages, it is part of our victory and it will come about following the military pressure. The war is not going to end.”⁴⁴
- On 23 May 2024, in response to a question at a press briefing about whether Israel would suspend its operation if the International Court of Justice rules against Israel in its 24 May Order, the **Israeli Government Spokesperson, Avi**

³⁸ United Nations Web TV (‘UN Web TV’), *The Situation in the Middle East, including the Palestinian Question - Security Council, 9540th meeting* (31 January 2024), <https://webtv.un.org/en/asset/k1z/k1zd06a6bl> [02:19:07].

³⁹ Israeli Ministry of Foreign Affairs, *South African allegations against Israel* (30 March 2024), <https://www.gov.il/en/pages/south-africa-icj>.

⁴⁰ See e.g., Shirit Avitan Cohen, “ICJ poised to order halt to Gaza war; Israel concerned over next steps”, *Israel Hayom* (23 May 2024), <https://www.israelhayom.com/2024/05/23/exclusive-icj-poised-order-halt-to-gaza-war/>; Itamar Eichner, “These are the ways the International Court of Justice could rule on the lawsuit against Israel”, *Ynet* (23 May 2024), <https://www.ynetnews.com/article/slxzpzpmr>.

⁴¹ Revital Gotliv, @Tallygotliv, Tweet (7:13 pm, 16 May 2024), <https://twitter.com/TallyGotliv/status/1791154950019461157>.

⁴² Israel Katz, @Israel_katz, Tweet (11:59 am, 17 May 2024), https://twitter.com/Israel_katz/status/1791408126643601607.

⁴³ 103FM, @radio103FM, Tweet (4:25 pm, 23 May 2024), <https://x.com/radio103fm/status/1793649357000200292>.

⁴⁴ 103FM, @radio103FM, Tweet (4:25 pm, 23 May 2024), <https://x.com/radio103fm/status/1793649578660487606>.

Hyman, stated that “[n]o power on earth will stop Israel from protecting its citizens, and going after Hamas in Gaza.”⁴⁵

- In the morning of 24 May 2024, before the Order was handed down, **Former Minister of National Security of Israel (until 19 January 2025), Itamar Ben-Gvir**, a member of the Security Cabinet ‘tweeted’ that “[o]nly increasing the pace and power of fighting, full entry into Rafah and a massive pounding of Hamas will lead to victory in the war and to returning the hostages. We should pay no regard to the Court in The Hague and the other tribunals in the world that want to hand out prizes to Hamas and are preventing us from winning the war.”⁴⁶

17. Israeli Ministers also expressed their rejection of the ICJ’s May Order, almost immediately on it being handed down on 24 May 2024. By way of example:

- **Former Minister of National Security of Israel (until 19 January 2025), Itamar Ben-Gvir**, a member of the Security Cabinet, reportedly stated that “[t]here should only be one answer to the irrelevant order of the antisemitic court in The Hague: the occupation of Rafah, the increase of military pressure and the complete crushing of Hamas”.⁴⁷ He further ‘tweeted’ a quote by Israel’s first Prime Minister David Ben-Gurion — “Our future does not depend on what the gentiles will say, but on what the Jews will do.”⁴⁸
- **Israel’s Minister of Finance, Bezalel Smotrich**, member of the Security Cabinet, ‘tweeted’ that “[t]he State of Israel is in a war for its existence. . . . Whoever demands of the State of Israel to stop the fighting, is demanding of it to sentence itself to nonexistence. We will not agree to this. . . . We continue to fight for our own sake and for the sake of the entire free world. History will judge those who stood today on the side of the Nazis from Hamas and ISIS.”⁴⁹
- **Israel’s Minister of Social Equality and the Advancement of the Status of Women, May Golan**, ‘tweeted’ “[a]s soon as the decision of the court in The Hague was announced — I instructed my ministry staff to warm up the shredders.”⁵⁰
- **Former Negev, Galilee and National Resilience Minister (until 19 January 2025), Yitzhak Wasserlauf**, reportedly stated “[w]e are deeply shocked by the biased and dangerous decision of the International Court in The Hague. This decision is not only shocking, but also a chilling reminder that anti-Semitism still exists and is gaining legitimacy. We reject this ruling in its entirety, which is not based on facts, or on international law, but is tainted with anti-Semitic odours that strengthen and perhaps encourage evil and terrorism in the world. This is a severe offense to the victims of Nazism and to historical justice. The court in the Hague has become Hamas’s protective vest”.⁵¹
- **Culture and Sports Minister of Israel, Miki Zohar**, reportedly stated “[t]he judges of the Hague Tribunal are welcome to visit Gaza and convince Hamas to return our hostages home. Until that happens, clearly there’s no option to stop

⁴⁵ Avi Hyman, @AviHyman, (1:10 pm, 24 May 2024), <https://x.com/AviHyman/status/1793962709735678182>.

⁴⁶ Itamar Ben Gvir, @itamarbengvir, Tweet (10:57 am, 24 May 2024), <https://twitter.com/itamarbengvir/status/1793929229429522651>.

⁴⁷ Anna Barsky, “Severe criticism in Israel of the Court in the Hague: ‘They have become collaborators with terrorists’”, *Maariv* (24 May 2024), <https://www.maariv.co.il/news/politics/Article-1101635>; also available at Sam Sokol, “‘Our future doesn’t depend on what gentiles say’: Ben Gvir, other far-right ministers dismiss ICJ ruling”, *The Times of Israel* (24 May 2024), https://www.timesofisrael.com/liveblog_entry/our-future-doesnt-depend-on-what-gentiles-say-ben-gvir-other-far-right-ministers-dismiss-icj-ruling.

⁴⁸ Itamar Ben Gvir, @itamarbengvir, Tweet (3:27 pm, 24 May 2024), <https://x.com/itamarbengvir/status/1793997190626673079/>.

⁴⁹ Bezalel Smotrich, @bezalelsm, Tweet (3:29 pm, 24 May 2024), <https://x.com/bezalelsm/status/1793997756027019390>.

⁵⁰ May Golan, @GolanMay, Tweet (3:34 pm, 24 May 2024), <https://x.com/GolanMay/status/1793998936207929474>.

⁵¹ Anna Barsky, “Severe criticism in Israel of the Court in the Hague: ‘They have become collaborators with terrorists’”, *Maariv* (24 May 2024), <https://www.maariv.co.il/news/politics/Article-1101635>.

the fighting in Rafah. Stopping the fighting would be a spit in the face of the captives, who are going through daily torture and hell, when the only way to save them is by applying pressure to Hamas”.⁵²

- **Minister of Settlements and National Missions, Orit Strock**, ‘tweeted’ “[t]he State of Israel is fighting for its life at the Hague, and for the life of the entire free world. And in any case it will continue to fight. The court that orders it to stop — is nothing but an anti-Semitic theatre of absurdity. A state that obeys its instructions — casts upon itself an indelible moral stain.”⁵³
- In a joint statement, the **Head of the Israeli National Security Council** and the **Spokesperson of the Israeli Ministry of Foreign Affairs** reiterated that “[t]he charges of genocide brought by South Africa against Israel at the International Court of Justice in the Hague are false, outrageous and morally repugnant”. They persisted in claiming that the May Order does not require Israel to alter its conduct, on the asserted basis that “Israel has not and will not conduct military actions in the Rafah area which may inflict on the Palestinian civilian population in Gaza conditions of life that could bring about its physical destruction in whole or in part.”⁵⁴ Such a position is untenable, having regard to the factual basis for the Court’s Order,⁵⁵ and the Court’s determination that “Israel has not sufficiently addressed and dispelled the concerns raised by its military offensive in Rafah.”⁵⁶

18. Members of the Knesset across all parties — both in government and in opposition — similarly rejected the ruling immediately. By way of example, on 24 May 2024:

- **Chairman of World Likud, then-Likud MK Danny Danon** ‘tweeted’: “The members of the court in The Hague deliberate in air-conditioned rooms and return to their families after the hearing, while 125 hostages languish in tunnels. The State of Israel will not stop the war until Hamas is defeated and our sons and daughters are returned home.”⁵⁷
- **Chairman of the Foreign Affairs and Defense Committee, Likud MK Yuli Edelstein**, ‘tweeted’ in relation to the Court’s Order that Israel “[i]mmediately halt its military offensive, and any other action in the Rafah Governorate”: “We are not in an operation, we are in a war. When we defeat terrorism and return all our captives home — we will end the ‘operation’.”⁵⁸
- **Chairman of the Constitution Committee and Religious Zionism Party MK Simcha Rothman**, ‘tweeted’: “The State of Israel’s highest obligation is to protect its citizens, retrieve the hostages, eliminate Hamas and restore the power of deterrence on all fronts, after the events of October 7th. That is the highest warrant the State of Israel must respect. Any other order of any other court does not take precedence over it [this warrant].”⁵⁹
- **Deputy Minister and Chairman of the Noam Party, MK Avi Maoz**, reportedly stated: “We are now committed to one thing only — defeating Hamas and Hezbollah and returning all our captives. No factor will prevent us from

⁵² Moran Azoulay, “‘A moral downfall, an ethical disaster’: Wall-to-wall condemnation among politicians of the decision in The Hague”, *Ynet* (24 May 2024), <https://www.ynet.co.il/news/article/bjraqfaxc>.

⁵³ Orit Strock, @oritstrock, Tweet (3:42 pm, 24 May 2024), <https://x.com/oritstrock/status/1794000980239069423>.

⁵⁴ Israel, @Israel, Tweet (6:55 pm, 24 May 2024), <https://x.com/Israel/status/1794049600644391140>.

⁵⁵ *South Africa v. Israel, Provisional Measures, Order of 24 May 2024*, paras. 28, 46 and 47.

⁵⁶ *Ibid.*, para. 46.

⁵⁷ Danny Danon, @dannydanon, Tweet (3:32 pm, 24 May 2024), <https://x.com/dannydanon/status/1793998619382776034>.

⁵⁸ Yuli Edelstein, @yuliedelstein, Tweet (4:12 pm, 24 May 2024), <https://x.com/YuliEdelstein/status/1794008654951125501>.

⁵⁹ Simcha Rothman, @rothmar, Tweet (3:54 pm, 24 May 2024), <https://x.com/rothmar/status/1794004146443420101>.

fighting for our lives, our existence and our national honour. We will not let anyone interfere with the continuing process of return to Zion.”⁶⁰

- **Yisrael Beiteinu Party MK, Avigdor Lieberman**, ‘tweeted’ that: “[t]oday’s court decision proves that the various UN institutions[,] as well as the criminal court in The Hague, have become collaborators of terrorists all over the world[,] and their entire role is to deter democratic countries in their struggle against terrorist organizations.”⁶¹
- **Labor MK Gilad Karib**, reportedly stated: “The International Court’s orders, as well as the disgraceful disregard of the hostages’ situation, once again prove international institutions’ double standard towards the State of Israel.”⁶²

19. The statements constitute an unprecedented attack by a State on the ICJ, the principal judicial organ of the United Nations.

Statement of contempt for the ICJ subsequent to the Advisory Opinion

20. On 19 July 2024, the International Court of Justice handed down its Advisory Opinion on the *Legal Consequences arising from the Policies and Practices of Israel in the Occupied Palestinian Territory, including East Jerusalem* (‘*Palestine Advisory Opinion*’) subsequent to a request by the United Nations General Assembly.⁶³ In its Advisory Opinion, the Court found *inter alia* that “Israel’s continued presence in the Occupied Palestinian Territory is unlawful”; is to be brought “to an end . . . as rapidly as possible”; that it must “cease immediately all new settlement activities” and “evacuate all settlers from the Occupied Palestinian Territory”; and that it must “make reparation for the damage caused to all the natural or legal persons concerned in the Occupied Palestinian Territory”.⁶⁴ On 18 September 2024 the General Assembly voted and overwhelmingly passed Resolution ES-10/24 implementing the Advisory Opinion.⁶⁵

21. Israel’s Ministers and other senior public officials have however clearly indicated their contempt for the Court and intention to aggravate their unlawful conduct, as opposed to desisting from it and tendering reparations. By way of example:

- On 19 July 2024, after the handing down of the Advisory Opinion, the **Prime Minister of Israel, Benjamin Netanyahu**, stated: “The Jewish people are not occupiers in their own land — not in Jerusalem, our eternal capital, nor in our ancestral lands in Judea and Samaria. No false decision at The Hague will distort this historical truth and likewise the legality of Israeli settlement in all areas of our homeland is indisputable.”⁶⁶

⁶⁰ Moran Azoulay, “‘A moral downfall, an ethical disaster’: Wall-to-wall condemnation among politicians of the decision in The Hague”, *Ynet* (24 May 2024), <https://www.ynet.co.il/news/article/bjraqfaxc>.

⁶¹ Avigdor Liberman, @AvigdorLiberman, Tweet (3:29 pm, 24 May 2024), <https://x.com/AvigdorLiberman/status/1793997697843683786>.

⁶² Moran Azoulay, “‘A moral downfall, an ethical disaster’: Wall-to-wall condemnation among politicians of the decision in The Hague”, *Ynet* (24 May 2024), <https://www.ynet.co.il/news/article/bjraqfaxc>.

⁶³ *Legal Consequences arising from the Policies and Practices of Israel in the Occupied Palestinian Territory including East Jerusalem, Advisory Opinion* (‘*Palestine Advisory Opinion*’), 19 July 2024, <https://www.icj-cij.org/sites/default/files/case-related/186/186-20240719-adv-01-00-en.pdf>, para. 1; UNGA, *Israeli practices and settlement activities affecting the rights of the Palestinian people and other Arabs of the occupied territories*, A/Res/77/247 (30 December 2022), <https://undocs.org/A/Res/77/247>, p. 8.

⁶⁴ *Palestine Advisory Opinion*, pp. 78-79, para. 285.

⁶⁵ UNGA, *Illegal Israeli actions in Occupied East Jerusalem and the rest of the Occupied Palestinian Territory*, A/RES/ES-10/24 (18 September 2024), <https://undocs.org/A/RES/ES-10/24>. 124 States voted in favour, 14 against, and 43 abstained, see UN News, *UN General Assembly demands Israel end ‘unlawful presence’ in Occupied Palestinian Territory* (18 September 2024), <https://news.un.org/en/story/2024/09/1154496>.

⁶⁶ Benjamin Netanyahu, @netanyahu, Tweet (4:45 pm, 19 July 2024), <https://x.com/netanyahu/status/1814310717526323575> (translation from Hebrew). See also, English-language reaction by the Prime Minister at Benjamin Netanyahu, @netanyahu, Tweet (5:28 pm, 19 July 2024), <https://x.com/netanyahu/status/1814321322983379059>.

- **Minister of Energy and Infrastructure of Israel, Eli Cohen**, member of Israel's Security Cabinet, also responded on 19 July 2024, with: "Judea and Samaria are the lands of our ancestors. We prayed to return there for 2,000 years and no warped decision by a biased and antisemitic court will move us an inch. In the past, some have called for us to get out of the Gaza Strip and promised us it would become the Singapore of the Middle East. Ultimately we got the state of Hamastan, and we have no intention of repeating that mistake in Central Israel as well."⁶⁷
- **Minister of Finance of Israel, Bezalel Smotrich**, member of Israel's Security Cabinet, 'tweeted': "The answer to The Hague — sovereignty now!"⁶⁸
- **Then-MK Gideon Sa'ar, now Israel's Minister of Foreign Affairs** and member of its Security Cabinet, stated: "The Israeli Knesset already gave the best answer to The Hague on Wednesday: the land of Israel belongs to the people of Israel. A terrorist Palestinian state will not arise."⁶⁹
- Israel's **Minister of Social Equality and the Advancement of Women, May Golan**, responded with: "A few minutes ago we were informed (with great excitement) of the verdict of the court in The Hague: 'Israeli settlements in East Jerusalem and the West Bank blatantly violate international law!' It's no longer truly a surprise that some of the antisemites at The Hague are bothered by Jews living in their land, what is surprising is that ever since the terrible October 7th, we realized that apparently 'international law' does allow the murder, rape, burning and kidnapping of Israelis wherever they are . . . Someone should tell the president of the International Court of Justice that Jews will no longer stand helplessly and face neo-Nazi murderers — and will no longer wait for the mercy of the worlds' hypocrites! The people of Israel will protect themselves in any way — and one of those important ways is: Settlement! Settlement!! Settlement!!! Less than a month ago, we marked the 20-year anniversary of the death of the poet Naomi Shemer ז"ל. The eternal and seminal words she wrote back in the day are the best reply to another disconnected and detached verdict from The Hague. 'Do not uproot a planted seed'. Another tractor plowing the land. Another stake driven into the ground. Another settlement all over the land of Israel. Am Yisrael Chai."⁷⁰
- **Former Minister of Heritage of Israel (until 19 January 2025), Amichay Eliyahu**, responded: "Following the International Court of Justice's deviation from principles of justice and morality, the State of Israel should declare its sovereignty over Judea, Samaria and the Jordan Valley."⁷¹
- **Then-Likud MK Danny Danon, current Ambassador of Israel to the United Nations**, 'tweeted' after the Court issued its Advisory Opinion: "The decision by the International Court of Justice in The Hague, which attempts to deny our right to our ancestral lands in Israel, is indeed unfortunate but expected. Unfortunately, this 'court' has long since turned into a political circus and is now a stronghold of Hamas supporters. The State of Israel will never relinquish its historical right to our land. This is the foundation of our existence here."⁷²
- **Likud MK Dan Illouz** responded with "The ICJ's decision is an outrageous, biased assault on Israel's sovereignty and security. Judea and Samaria are integral parts of our ancestral homeland, recognized by international law at the San Remo Conference and under the League of Nations Mandate. Instead of retreating, we must apply full sovereignty over these lands. This ruling panders to terror-supporting entities and ignores the reality on the ground. Israel will not

⁶⁷ Eli Cohen, @elicoh1, Tweet (5:07 pm, 19 July 2024), <https://x.com/elicoh1/status/1814316257388196011>.

⁶⁸ Bezalel Smotrich, @bezalelsm, Tweet (3:36 pm, 19 July 2024), <https://x.com/bezalelsm/status/1814293163575492614>.

⁶⁹ Gideon Sa'ar, @gidonsaar, Tweet (5:28 pm, 19 July 2024), <https://x.com/gidonsaar/status/1814321403086213548>.

⁷⁰ May Golan, @GolanMay, Tweet (4:27 pm, 19 July 2024), <https://x.com/GolanMay/status/1814306175933943914>.

⁷¹ Amichay Eliyahu, @Eliyahu_a, Tweet (4:53 pm, 19 July 2024), https://x.com/Eliyahu_a/status/1814312629101351033.

⁷² Danny Danon, @dannyanon, Tweet (5:34 pm, 19 July 2024), <https://x.com/dannyanon/status/1814322973030990073>.

be dictated by unjust international bodies. We will defend our land and our people with unwavering resolve.”⁷³

- **Otzma Yehudit MK**, Limor Son Har-Melech, ‘tweeted’ in response to the Court’s Advisory Opinion: “The only solution is to declare sovereignty and encourage emigration. The answer to The Hague has to be declaring sovereignty immediately in Judea and Samaria as well as in the Gaza Strip.”⁷⁴

Statements of Contempt for the United Nations in General

22. The contempt for the International Court of Justice reflects the contempt that Israeli officials have routinely expressed for the United Nations more generally, particularly in relation to Israel’s assault on Gaza. The following statements by **Israel’s Permanent Representative to the United Nations until August 2024, Gilad Erdan**, are illustrative:

- On **2 December 2023**, he ‘tweeted’ that “[t]he UN has officially become *Hamas’ accomplice*!! Our soldiers have irrefutably exposed how UNRWA aid — aid that is meant to benefit Gazan civilians — is exploited by Hamas to conceal missiles and rockets used to murder Israeli civilians. I show-cased Hamas’ cynical use of the UN’s aid, at the UN and to UN officials. The UN’s indifference to terrorists exploiting UN resources makes the UN a direct accomplice in terror!”⁷⁵
- On **26 January 2024**, he ‘tweeted’ that “[t]he UN is not only weaponized to delegitimize our existence, but also to physically exterminate us.”⁷⁶
- On **21 February 2024**, he ‘tweeted’ that “[i]t is no longer possible to believe any report or data provided by the UN” because “In Gaza, Hamas is the UN, and the UN is Hamas!”⁷⁷
- On **8 April 2024**, he stated: “breaking the Guinness World Record for rewarding terror, the UN now is in complete violation of its charter, is considering to force the establishment of a Palestinian terror State . . . if Hitler were alive today, he would be singing the UN’s praises”. He further stated that “the [UN] Security Council, it shall forever be known as the terror council”.⁷⁸
- On **26 April 2024**, he ‘tweeted’ that: “In an interview with @israelhayomheb I said that the UN has become a Hamas collaborator! Israel will have to lay down new ‘rules of the game’, which will include closing UN compounds, denying visas and deporting UN workers who act against us. If this corrupt organization will still not treat us decently after the rules change - we will have to consider leaving the UN.”⁷⁹
- On **15 May 2024**, Israel’s then-Ambassador was reported to have accused the United Nations on Israeli Army Radio of having “turned into a collaborator with Hamas . . . maybe even more than that — a terror organisation unto itself”.⁸⁰

⁷³ Dan Illouz, @dillouz, Tweet (4:28 pm, 19 July 2024), <https://x.com/dillouz/status/1814306215029084452>.

⁷⁴ Limor Son Har-Melech, @limor_sonhrmelh, Tweet (4:27 pm, 19 July 2024), https://x.com/limor_sonhrmelh/status/1814306017372463575.

⁷⁵ Ambassador Gilad Erdan, @giladerdan1, Tweet (7:36 pm, 2 December 2023), <https://twitter.com/giladerdan1/status/1731004542307701078>.

⁷⁶ Ambassador Gilad Erdan, @giladerdan1, Tweet (7:15 pm, 26 January 2024), <https://twitter.com/giladerdan1/status/1750930495276302500>.

⁷⁷ Ambassador Gilad Erdan, @giladerdan1, Tweet (12:40 am, 21 February 2024), <https://twitter.com/giladerdan1/status/1760071998502248913>.

⁷⁸ Ambassador Gilad Erdan, @giladerdan1, Tweet (9:09 pm, 8 April 2024), <https://twitter.com/giladerdan1/status/1777413394263408977>.

⁷⁹ Ambassador Gilad Erdan, @giladerdan1, Tweet (5:53 am, 26 April 2024), <https://twitter.com/giladerdan1/status/1783705992317808880>.

⁸⁰ Neri Zilber, “Israel calls UN a ‘terror organisation’ as tensions escalate over Gaza war”, *Financial Times* (15 May 2024), <https://www.ft.com/content/f0945f3c-e4ab-4c04-8e1e-1e6f8397cb2c>.

- On **19 August 2024**, an excerpt of an interview with Gilad Erdan was aired in which he stated the UN building should be erased: “This building might look nice on the outside, but it is rotten and warped from the inside. It should be closed and erased from the face of the earth”.⁸¹

23. Such statements are representative of the position of Israel itself. They are routinely reflected in statements by other senior Israeli officials, including Ministerial members of the Israeli Security Cabinet, responsible for the conduct of Israel’s military operations in Gaza. By way of example:

- On 23 March 2024, the then-**Minister for Foreign Affairs of Israel, Israel Katz**, member of the Security Cabinet, ‘tweeted’ that “. . . [u]nder his [United Nations Secretary-General António Guterres’] leadership, the @UN has become an antisemitic and anti-Israeli body that shelters and emboldens terror.”⁸²
- On 25 March 2024, in response to United Nations Security Council Resolution 2728 of 25 March 2024, that “demand[ed] an immediate ceasefire . . . leading to a lasting sustainable ceasefire”,⁸³ then-**Minister without portfolio of Israel and member of the then-War Cabinet, Benny Gantz** ‘tweeted’ “[t]he State of Israel has a moral obligation to keep fighting until the hostages are returned and the threat of Hamas is removed and that is what we’ll do. The Security Council’s decision has no operative significance for us, and in any case, we will continue listening to our friends, and will always do what is right for the security of Israel.”⁸⁴

24. Israel’s attack on the United Nations subsequently escalated, resulting in the banning of the United Nations Secretary General from Israel, with **then-Minister of Foreign Affairs Israel Katz** announcing on 2 October 2024 that “[t]oday, I have declared UN Secretary-General @antonioguterres persona non grata in Israel and banned him from entering the country.”⁸⁵

Statements of Contempt for United Nations-mandated investigations

25. Israel’s senior public officials have also demonstrated their contempt for United Nations-mandated Special Rapporteurs and investigative bodies, whose mandate comprises Israel’s conduct in Gaza and the occupied Palestinian territory:

- On 24 February 2024, then-**Minister of Foreign Affairs Israel Katz** posted “The ‘Special Rapporteurs’ of the @UNHumanRights Council published a report calling for an arms embargo on Israel. Since the October 7 massacre, the @UN has cooperated with Hamas terrorists and is trying to undermine Israel’s right to defend itself and its citizens. Ignoring the war crimes, sexual crimes and crimes against humanity committed by Hamas terrorists constitutes a stain that cannot be erased on the UN as an organization and personally on the UN Secretary-General @antonioguterres himself.”⁸⁶
- On 12 June 2024, after the United Nations Commission of Inquiry’s release of its report(s) finding Israeli authorities are responsible for war crimes and crimes against humanity committed during the military operations and attacks in Gaza since 7 October 2023, and Palestinian armed groups committed war crimes on 7 October 2023,⁸⁷ the **spokesperson for Israel’s Minister of Foreign Affairs**,

⁸¹ Yigal Ravid, “Gilad Erdan in an interview: ‘The UN building should be erased’”, *i24 News* (19 August 2024), <https://www.i24news.tv/he/news/international/usa-canada/artc-d346461f>.

⁸² Israel Katz, @Israel_katz, Tweet (3:50 pm, 23 March 2024), https://twitter.com/Israel_katz/status/1771534978364383484.

⁸³ United Nations Security Council (‘UNSC’), Res. 2728, *The situation in the Middle East, including the Palestinian question*, S/RES/2728(2024) (25 March 2024), [https://undocs.org/S/RES/2728\(2024\)](https://undocs.org/S/RES/2728(2024)).

⁸⁴ Benny Gantz, @gantzbe, Tweet (7:14 pm, 25 March 2024), <https://twitter.com/gantzbe/status/1772310981743415511>.

⁸⁵ Israel Katz, @Israel_Katz, Tweet (12:17 pm, 2 October 2023), https://x.com/Israel_katz/status/1841422324890812763.

⁸⁶ Israel Katz, @Israel_Katz, Tweet (6:13 pm, 24 February 2024), https://x.com/Israel_katz/status/1761424126483341557.

⁸⁷ UN OHCHR, *Israeli authorities, Palestinian armed groups are responsible for war crimes, other grave violations of international law, UN Inquiry finds* (12 June 2024), <https://www.ohchr.org/en/press-releases/2024/06/israeli-authorities-palestinian-armed-groups-are-responsible-war-crimes>.

Oren Marmorstein called it: “another example of the cynical political theater called the UN, and another example of the low point the organization has reached under UN Secretary General Guterres”; “prepared by an entity born in sin”; and stating it “is full of false accusations and blood libels against IDF soldiers. Not surprising but still disappointing: in the era of Guterres at the UN, another new record of disconnect between the UN and the reality faced by democratic countries was registered today.”⁸⁸

Israel’s Attacks on the International Criminal Court

26. Similar contempt has also been shown by Israel’s key officials to the International Criminal Court specifically, after the OTP’s request for arrest warrants, and after Pre-Trial Chamber I’s issuance of arrest warrants, for Prime Minister Benjamin Netanyahu and former Minister of Defence Yoav Gallant.⁸⁹ Such contempt follows repeated attempts by Israel to intimidate and deter those seeking its accountability through that Court,⁹⁰ and of the Court’s officials itself.⁹¹

Attacks after the OTP’s request for Arrest Warrants

- On 26 April 2024, the **Prime Minister of Israel** advocated against any further ICC action against Israeli officials in the context of its investigation into the Situation in the State of Palestine, saying “Israel will continue to wage to victory our just war against genocidal terrorists and we will never stop defending ourselves. While

⁸⁸ Oren Marmorstein, @OrenMarmorstein, Tweet (9:47 pm, 12 June 2024), <https://x.com/OrenMarmorstein/status/1800978175595344053>.

⁸⁹ ICC, *Situation in the State of Palestine: ICC Pre-Trial Chamber I rejects the State of Israel’s challenges to jurisdiction and issues warrants of arrest for Benjamin Netanyahu and Yoav Gallant* (21 November 2024), <https://www.icc-cpi.int/news/situation-state-palestine-icc-pre-trial-chamber-i-rejects-state-israels-challenges>; ICC, *Statement of ICC Prosecutor Karim A.A. Khan KC: Applications for arrest warrants in the situation in the State of Palestine* (20 May 2024), <https://www.icc-cpi.int/news/statement-icc-prosecutor-karim-aa-khan-kc-applications-arrest-warrants-situation-state>.

⁹⁰ Colin Powers, “Palestine on the Brink of Crisis”, *Middle East Research and Information Project* (30 June 2020), <https://merip.org/2020/06/palestine-on-the-brink-of-crisis/>; “Israel freezes tax revenues for Palestinian Authority”, *Middle East Monitor* (30 October 2023), <https://www.middleeastmonitor.com/20231030-israel-freezes-tax-revenues-for-palestinian-authority/>; “Israel freezes Palestinian tax funds over international criminal court move”, *The Guardian* (3 January 2015), <https://www.theguardian.com/world/2015/jan/03/israel-tax-payments-withhold-palestine-international-criminal-court>; “Israel revokes permit of Palestinian foreign minister”, *Al Jazeera* (22 March 2021), <https://www.aljazeera.com/news/2021/3/22/israel-revokes-permit-of-palestinian-foreign-minister>; Yuval Abraham and Meron Rapoport, “Surveillance and interference: Israel’s covert war on the ICC exposed”, *+972 Magazine* (28 May 2024), <https://www.972mag.com/icc-israel-surveillance-investigation/>; Frontline Defenders, *Six Palestinian human rights defenders hacked with NSO Group’s Pegasus Spyware* (8 November 2021), <https://www.frontlinedefenders.org/en/statement-report/statement-targeting-palestinian-hrds-pegasus>. See also UNGA, *Report of the Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967*, A/HRC/34/70 (13 April 2017), <https://documents.un.org/doc/undoc/gen/g17/091/45/pdf/g1709145.pdf>, p. 12, para. 44; ICC, *Report on Preliminary Examination Activities 2016* (14 November 2016), https://www.icc-cpi.int/sites/default/files/iccdocs/otp/161114-otp-rep-PE_ENG.pdf, p. 32, para. 144; The Observatory for the Protection of Human Rights Defenders, *Target Locked: The Unrelenting Israeli Smear Campaigns to Discredit Human Rights Groups in Israel, Palestine, and the Syrian Golan* (April 2021), https://target-locked-obs-defenders.org/IMG/pdf/obs_palestine2021ang-1.pdf, p. 47; UN OHCHR, *Israel/Palestine: UN experts call on governments to resume funding for six Palestinian CSOs designated by Israel as ‘terrorist organisations’* (25 April 2022), <https://www.ohchr.org/en/press-releases/2022/04/israelpalestine-un-experts-call-governments-resume-funding-six-palestinian>; UN Meetings Coverage and Press Releases, *Outraged over Israel’s Designation of Six Civil Society Groups as Terrorists, Speakers Tell Palestinian Rights Committee Harassment against Human Rights Defenders Must End* (7 December 2021), <https://press.un.org/en/2021/gapa1443.doc.htm>; UN The Question of Palestine, *Human Rights Committee’s Concluding Observations on Fifth Periodic Report of Israel*, CCPR/C/ISR/CO/5 (5 May 2022), <https://www.un.org/unispal/document/human-rights-committees-concluding-observations-on-fifth-periodic-report-of-israel-ccpr-c-isr-co-5-advance-unedited-version/>, p. 4, paras. 18-19.

⁹¹ Harry Davies, “Revealed: Israeli spy chief ‘threatened’ ICC prosecutor over war crimes inquiry”, *The Guardian* (28 May 2024), <https://www.theguardian.com/world/article/2024/may/28/israeli-spy-chief-icc-prosecutor-war-crimes-inquiry>; Harry Davies *et al.*, “Spying, hacking and intimidation: Israel’s nine-year ‘war’ on the ICC exposed”, *The Guardian* (28 May 2024), <https://www.theguardian.com/world/article/2024/may/28/spying-hacking-intimidation-israel-war-icc-exposed>; Harry Davies, “Dutch foreign ministry calls in Israeli ambassador over ICC spying claims”, *The Guardian* (26 June 2024), <https://www.theguardian.com/law/article/2024/jun/26/dutch-foreign-ministry-israeli-ambassador-icc-spying-claims>.

the ICC will not affect Israel's actions, it would set a dangerous precedent that threatens the soldiers and officials of all democracies fighting savage terrorism and wanton aggression"⁹²

- On 20 May 2024, the day of the ICC's OTP's request for arrest warrants against both Prime Minister Benjamin Netanyahu and then-Minister of Defence of Israel Yoav Gallant, the **Prime Minister** stated: "the outrageous decision by the ICC prosecutor Karim Khan, to seek arrest warrants against the democratically elected leaders of Israel is a moral outrage of historic proportions . . . what a travesty of justice, what a disgrace, the prosecutor's absurd charges against me and Israel's Defense Minister are merely an attempt to deny Israel the basic right of self-defence . . . Mr. Khan's abuse of this authority will turn the ICC into nothing more than a farce. He is doing something else, he is callously pouring gasoline on the fires of antisemitism that are raging across the world. Through this incendiary decision Mr. Khan takes his place among the great antisemites of modern times. He now stands alongside those infamous German judges who donned their robes and upheld laws that denied the Jewish people their most basic rights and enabled the Nazis to perpetrate the worst crime in history. . . I pledged this: no amount of pressure and no decision in any international forum will prevent Israel from defending itself against those who seek our destruction. To all the enemies of Israel, including their collaborators in the Hague, I renew that pledge today. . ."⁹³
- On 20 May 2024, Israel's **former Minister without Portfolio and former War Cabinet member Benny Gantz** warned that "[a]ccepting the [ICC] prosecutor's position, would be an indelible historical crime."⁹⁴
- On 20 May 2024, Israel's **Minister of Finance, Bezalel Smotrich**, member of the Security Cabinet, stated: "We haven't seen such a show of hypocrisy and hatred of Jews like that of the Hague Tribunal since Nazi propaganda. The Nazis also spoke in the name of 'morality' [and] there wasn't anything there besides good old antisemitism as we've experienced throughout every generation either. Israel's haters come and go, the [eternal] Glory of Israel does not deceive [I Samuel 15]. These arrest warrants will be the last nail in the dismantling of this political and antisemitic Court. The friends of Israel and truly enlightened countries will not be able to allow its continued existence and functioning. . ."⁹⁵
- On 20 May 2024 **then-MK, now-Foreign Minister, Gideon Sa'ar** stated in response to the arrest warrant request that: "the ICC's decision is a testimony that the International Law institutions are failing, following the farce of the South African appeal in the ICJ."⁹⁶
- On 10 September 2024, the **Prime Minister** continued his incitement against the ICC's OTP, stating: "The comparison made by the prosecutor at The Hague between the Prime Minister and Minister of Defense of Israel, [a country] that is fighting Hamas's murderous terrorism according to the laws of war; and between the war criminal Sinwar, who is executing Israeli hostages in cold blood; is pure antisemitism and a moral disgrace of the first order."⁹⁷

⁹² Benjamin Netanyahu, @netanyahu, Tweet (3:47 pm, 26 April 2024), <https://x.com/netanyahu/status/1783855474573492732>.

⁹³ Benjamin Netanyahu, @netanyahu, Tweet (8:28 pm, 20 May 2024), <https://x.com/netanyahu/status/1792623424893784221>.

⁹⁴ "Israeli society reacts to ICC warrant for Netanyahu's arrest for Gaza war", *i24 News* (20 May 2024), <https://www.i24news.tv/en/news/israel-at-war/artc-israel-reacts-to-icc-s-warrant-for-netanyahu-s-arrest>; Benny Gantz, @gantzbz, Tweet (1:39 pm, 20 May 2024), <https://x.com/gantzbe/status/1792520426368749856>.

⁹⁵ Bezalel Smotrich, @bezalelsm, Tweet (1:55 pm, 20 May 2024), <https://x.com/bezalelsm/status/1792524477051330991>; also available in part at "Israeli society reacts to ICC warrant for Netanyahu's arrest for Gaza war", *i24 News* (20 May 2024), <https://www.i24news.tv/en/news/israel-at-war/artc-israel-reacts-to-icc-s-warrant-for-netanyahu-s-arrest>.

⁹⁶ Itamar Eichner and Moran Azulai, "Urgent Consultations in Israel Following The Hague Prosecutor's Request to Issue Arrest Warrants: 'Contemptuous, Hypocrisy.'", *Ynet* (20 May 2024), <https://www.ynet.co.il/news/article/rylwxnoma>; also available at "Gideon Sa'ar quote", *The Zionism Observer* (20 May 2024), <https://zionism.observer/quotes/gideon-saar/the-icc-decision-is-evide>.

⁹⁷ Israeli PM, @IsraeliPM_heb, Tweet (5:05 pm, 10 September 2024) https://x.com/IsraeliPM_heb/status/1833522064453456114.

Attacks after the Pre-Trial Chamber I's issuance of Arrest Warrants

27. On 21 November 2024, the International Criminal Court's Pre-Trial Chamber I issued arrest warrants against Prime Minister Benjamin Netanyahu and former Minister of Defence Yoav Gallant, including for the war crimes of starvation as a method of warfare and intentionally directing an attack against the civilian population; and the crimes against humanity of murder, persecution, and other inhumane acts in the context of Israel's creation of "conditions of life calculated to bring about the destruction of part of the civilian population in Gaza".⁹⁸ Israeli officials reacted by attacking and threatening the Court:

- On 21 November 2024, **Isaac Herzog, President of Israel** called that day of the issuance of the arrest warrants a "dark day for justice. A dark day for humanity"; referred to the arrest warrants issuance as a "cynical exploitation of the international legal institutions": stated *inter alia* that "the outrageous decision at the ICC has turned universal justice into a universal laughing stock. It makes a mockery of the sacrifice of all those who fight for justice - from the Allied victory over the Nazis till today"; and stated that "the decision has chosen the side of terror and evil over democracy and freedom, and turned the very system of justice into a human shield for Hamas' crimes against humanity."⁹⁹
- **Prime Minister Benjamin Netanyahu**, that same day, stated *inter alia*: [t]he antisemitic decision of the International Court in the Hague is a modern Dreyfus trial . . . now an international Court in the Hague, also headed by a French judge, is repeating this outrageous offence. . . just in the last few weeks Israel facilitated the vaccination of 97 per cent of the people of Gaza against polio, this doesn't prevent the Court from accusing us of genocide. What in God's name are they talking about in the Hague? . . . the decision to issue an arrest warrant against me, the democratically elected Prime Minister of the State of Israel and our former defence Minister was made by a rogue prosecutor who is trying to extricate himself from sexual harassment charges, and by biased judges who are motivated by antisemitic sentiments against the one and only Jewish State . . . I want to thank our many friends around the world, especially those in the United States who have condemned this outrage and who have said that this decision will have severe consequences for the ICC and those who cooperate with its decision. Israel does not, Israel will not, recognise the validity of this decision . . . our victory will be your victory, the victory of civilisation over barbarism and tyranny."¹⁰⁰
- On 21 November 2024, the new **Minister of Defence Israel Katz** stated: "The decision by the International Criminal Court in The Hague to issue arrest warrants against Prime Minister Netanyahu and former Defense Minister Gallant is a moral disgrace, entirely tainted by antisemitism, and drags the international judicial system to an unprecedented low. . . We will not allow a hostile, hypocritical, and illegitimate body to harm our leaders or our soldiers . . . Anyone who thinks they can deter us from achieving all our war objectives through absurd decisions that serve Iran and its proxies will face a strong and resolute state, acting with power in every arena — military, political, and legal — to counter every threat".¹⁰¹

⁹⁸ ICC, *Situation in the State of Palestine: ICC Pre-Trial Chamber I rejects the State of Israel's challenges to jurisdiction and issues warrants of arrest for Benjamin Netanyahu and Yoav Gallant* (21 November 2024), <https://www.icc-cpi.int/news/situation-state-palestine-icc-pre-trial-chamber-i-rejects-state-israels-challenges>.

⁹⁹ Isaac Herzog, @Isaac_Herzog, Tweet (2:44 pm, 21 November 2024), https://x.com/Isaac_Herzog/status/1859578515487592658.

¹⁰⁰ Benjamin Netanyahu, @netanyahu, Tweet (10:45 pm, 21 November 2024), <https://x.com/netanyahu/status/1859699642809843868>.

¹⁰¹ Israel Katz, @Israel_Katz, Tweet (3:29 pm, 21 November 2024), https://x.com/Israel_katz/status/1859589862761902113.

- The new **Minister of Foreign Affairs, Gideon Sa'ar** referred to the issuance of warrants as “[a] dark moment for the International Criminal ‘Court’ (ICC) in The Hague, in which it lost all legitimacy for its existence and activity . . . This so-called ‘court’ issued absurd and unauthorized warrants . . . These warrants . . . in essence, they are an assault on Israel’s right to defend itself. This is an attack on the most threatened and targeted nation in the world . . . From a moral perspective, this represents a moral eclipse that turns good into evil and serves the forces of evil.”¹⁰²
- On 21 November 2024, **Minister of Finance Bezalel Smotrich** stated that “[t]he decision of the Court at The Hague is a twisted and detached step, which reflects anti-Semitism and hatred of Israel. This is a mark of Cain on an international institution that has lost its credibility and moral integrity a long time ago. Israel must sever contact with the Court and take decisive measures against the agents that led to the initiation of the procedure, and first among them the Palestinian Authority. . . I call on the Prime Minister to finally implement the Cabinet decision that I led and impose painful sanctions on the Authority and its leaders to the point of its collapse.”¹⁰³
- Several hours after the issuance of the arrest warrants, **Former Minister of National Security of Israel (until 19 January 2025), Itamar Ben-Gvir** characterised the decision as “ . . . [t]he International Criminal Court in The Hague demonstrate[ing] once again that it is anti-Semitic through and through. This is complete madness. I support the Prime Minister in this just war. The answer to the arrest warrants — implementing sovereignty over all the territories of Judea and Samaria, settlement in all parts of the country and severing ties with the Terrorist Authority, including sanctions.”¹⁰⁴
- That same day, the **former Minister of Defence MK Yoav Gallant** ‘tweeted’ *inter alia* that “[t]he decision of the Court in The Hague will be remembered shamefully forever — it groups the State of Israel and the murderous leaders of Hamas together and thus legitimizes the murder of babies, the rape of women and the abduction of elderly people from their beds. The decision sets a dangerous precedent against the right to self-defense and moral warfare, and it encourages murderous terrorism.”¹⁰⁵
- On 21 November 2024, **MK Benny Gantz**, formerly a Minister without portfolio and formerly part of the now-defunct War Cabinet stated: “[t]he ICC’s decision — moral blindness and shameful stain of historic proportion that will never be forgotten.”¹⁰⁶

Required Urgent Action

28. Israel’s concerted attacks on the United Nations, its bodies and organs — including Israel’s mass killing of United Nations personnel, constituting “the largest single loss of life in the history” of the United Nations¹⁰⁷ — together with Israel’s contempt for the International Court of Justice and the International Criminal Court, require urgent action by the United Nations and third States to ensure Israel’s compliance with binding Orders of the International Court of Justice.

¹⁰² Gideon Sa’ar, @gidonsaar, Tweet (3:18 pm, 21 November 2024), <https://x.com/gidonsaar/status/1859587210548310191>.

¹⁰³ Bezalel Smotrich, @bezalelsm, Tweet (3:49 pm, 21 November 2024), <https://x.com/bezalelsm/status/1859594954399678796>.

¹⁰⁴ Itamar Ben-Gvir, @itamarbengvir, Tweet (2:28 pm, 21 November 2024), <https://x.com/itamarbengvir/status/1859574591363891678>.

¹⁰⁵ Yoav Gallant, @yoavgallant, Tweet (5:54 pm, 21 November 2024), <https://x.com/yoavgallant/status/1859626454818095276>.

¹⁰⁶ Benny Gantz, @gantzbe, Tweet (2:13 pm, 21 November 2024), <https://x.com/gantzbe/status/1859570824602063107>.

¹⁰⁷ UN Secretary-General, *Secretary-General’s statement to the press - on the Middle East* (15 January 2024), <https://www.un.org/sg/en/content/sg/statement/2024-01-15/secretary-generals-statement-the-press-the-middle-east>. By 31 December 2024, 363 aid workers were killed in Gaza, of which 262 were UN staff: UN OCHA, *Reported impact snapshot | Gaza Strip (31 December 2024)* (31 December 2024), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-31-december-2024>.