

**Совет Безопасности**

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**Письмо Постоянного представителя Южной Африки при
Организации Объединенных Наций от 8 сентября 2025 года
на имя Председателя Совета Безопасности**

Имею честь препроводить Вам документ, озаглавленный «Публичное до-
сье, касающееся ужесточения государством Израиль действий по созданию си-
туации голода, применения им тактики использования помощи в качестве ору-
жия и дальнейших проявлений намерения совершить геноцид в отношении па-
лестинцев в Газе» (см. приложение)*.

Буду признательна за распространение настоящего письма и приложения к
нему в качестве документа Совета Безопасности и доведение их содержания до
сведения членов Совета.

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* Приложение распространяется только на том языке, на котором оно было представлено.



Приложение к письму Постоянного представителя Южной Африки при Организации Объединенных Наций от 8 сентября 2025 года на имя Председателя Совета Безопасности

**PUBLIC DOSSIER
RELATING TO THE STATE OF ISRAEL'S EXACERBATED ACTS OF
STARVATION, WEAPONISATION OF AID AND FURTHER
EXPRESSIONS OF GENOCIDAL INTENT AGAINST THE
PALESTINIANS IN GAZA**

I. INTRODUCTION

1. This Dossier follows two public dossiers of material evidence collected by the Republic of South Africa ('South Africa'), which is in the public domain, relating to genocidal conduct by the State of Israel ('Israel') against Palestinians in Gaza. On 29 May 2024 South Africa submitted a dossier to the United Nations Security Council ('Security Council') in which it set out a brief overview of the 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.¹ On 28 February 2025 South Africa submitted a second dossier of openly available evidence collated by South Africa relating to Israel's pattern of conduct and breaches of the Genocide Convention, including statements by Israeli leaders, military officers and others.²

2. Appalling developments over the past few months have required the presentation of this third dossier, highlighting specifically the exacerbation of Israel's genocidal campaign of the starvation of Palestinians. South Africa has previously provided evidence to show a pattern of Israel denying humanitarian aid to Palestinians in Gaza and the associated policy of starvation of that community. Since then — and again, in complete defiance of the provisional measures ordered by the International Court of Justice ('the Court') on 26 January 2024; 28 March 2024; and 24 May 2024 — Israel's overall plan has now reached its next phase in the light of the escalation of its clear genocidal strategy to force starvation on the people of Gaza under the guise of pressuring their expulsion from a territory they cannot in fact escape.

3. All patterns of genocidal conduct documented in South Africa's second Dossier persist without interruption — and most recently, on 28 July 2025, two leading human rights organisations based in Israel, B'Tselem and Physicians for

¹ Letter from the Permanent Representative of South Africa to the United Nations addressed to the President of the Security Council, S/2024/419, United Nations Security Council ('UNSC') (29 May 2024), <https://undocs.org/S/2024/419>.

² Letter from the Permanent Representative of South Africa to the United Nations addressed to the President of the Security Council, S/2025/130, UNSC (28 February 2025), <https://undocs.org/S/2025/130>.

Human Rights, stressed that Israel is committing genocide against Palestinians in Gaza.³

4. The focus of this dossier is on the weaponisation of starvation — together with the resulting mass displacement now visible to the world — which demands the urgent attention of the international community.

5. On 29 July 2025, the Integrated Food Security Phase Classification ('IPC') issued an urgent alert — endorsed by the Famine Review Committee — entitled "[w]orst-case scenario of Famine unfolding in the Gaza Strip". The alert urged:⁴

"The worst-case scenario of Famine is currently playing out in the Gaza Strip. Conflict and displacement have intensified, and access to food and other essential items and services has plummeted to unprecedented levels. Mounting evidence shows that widespread starvation, malnutrition, and disease are driving a rise in hunger-related deaths. Latest data indicates that

³ See Physicians for Human Rights, *Position Paper, Destructions of conditions of life: A Health Analysis of the Gaza Genocide* (July 2025), <https://www.phr.org.il/wp-content/uploads/2025/07/Genocide-in-Gaza-PHRI-English.pdf>; B'Tselem, *Our Genocide* (July 2025), https://www.btselem.org/sites/default/files/publications/202507_our_genocide_eng.pdf, detailing the genocidal conduct of Israel from October 2023 to mid-2025. These reports follow the early warnings and extensive reporting from Palestinian human rights organisations, see e.g. Al-Haq, Palestinian Centre for Human Rights ('PCHR') and Al Mezan Center for Human Rights ('Al Mezan'), *Urgent Action: Palestinian Human Rights Organisations Call on Third States to Urgently Intervene to Protect the Palestinian People Against Genocide* (13 October 2025), <https://pchrgaza.org/urgent-action-palestinian-human-rights-organisations-call-on-third-states-to-urgently-intervene-to-protect-the-palestinian-people-against-genocide-2/>; Al-Haq, *PHROC Calls on the State of Palestine and Third States to Intervene Taking Concrete Measures and Legal Action to Prevent Genocide in Gaza* (15 November 2023), <https://www.alhaq.org/advocacy/22188.html>; Al Mezan, *The Plight of Palestinian Women Amid Ongoing Gaza Genocide* (23 December 2023), <https://mezan.org/public/en/post/46342>; Al Haq, *How to Hide a Genocide: The Role of Evacuation Orders and Safe Zones in Israel's Genocidal Campaign in Gaza* (1 January 2025), <https://www.alhaq.org/publications/25781.html>; PCHR, *Severed Bodies, Shattered Souls: Women in Gaza Victims of Genocide* (26 March 2025), <https://pchrgaza.org/wp-content/uploads/2025/05/Women-in-Gaza-Victims-of-Genocide.pdf>; PCHR, *"We will Leave them Nothing": The Israeli Systematic Destruction of the Agricultural Sector and Food Production Systems in Gaza* (5 May 2025), <https://pchrgaza.org/wp-content/uploads/2025/05/We-Will-Leave-Them-Nothing.pdf>; PCHR, *The Silent Death: Cancer Patients Left to Die Waiting: Victims of Genocide in the Gaza Strip* (10 May 2025), <https://pchrgaza.org/wp-content/uploads/2025/05/The-Silent-Death.pdf>; Addameer, *Arrests and Prisons: A Continuation of Genocidal Acts 2024* (12 May 2025), <https://addameer.ps/sites/default/files/publications/Arrests%20and%20Prisons%20reviewed-%20EN%20%281%29.pdf>; PCHR, *Torture and Genocide: the Shattered Futures of Former Detainees in Gaza* (12 May 2025), <https://pchrgaza.org/wp-content/uploads/2025/05/Torture-and-Genocide-The-Shattered-Futures-of-Former-Palestinian-Detainees-in-Gaza.pdf>; Defence for Children International Palestine ('DCI Palestine') and Doctors Against Genocide, *Starving a Generation: Israel's Famine Campaign Targeting Palestinian Children in Gaza* (24 June 2025), https://assets.nationbuilder.com/dcipalestine/pages/5323/attachments/original/1750777756/Starving_a_Generation.pdf.

⁴ Integrated Food Security Phase Classification ('IPC'), *IPC Alert: Worst-case scenario of Famine unfolding in the Gaza Strip* (29 July 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_GazaStrip_Alert_July2025.pdf.

Famine thresholds have been reached for food consumption in most of the Gaza Strip and for acute malnutrition in Gaza City.”

The IPC stresses the urgent need for “immediate action. . . to end the hostilities and allow for unimpeded, large-scale, life-saving humanitarian response” as the “only path to stopping further deaths and catastrophic human suffering”.⁵ While the IPC’s alert is crucial, the World Food Programme (‘WFP’) reminds the international community that “[t]he unbearable suffering of the people of Gaza is already clear for the world to see. Waiting for official confirmation of famine to provide life-saving food aid they desperately need is unconscionable . . . the longer we wait to act, the higher the death toll will rise.”⁶ The starvation is occurring in a dystopian context, through the increasingly militarised and violent manner in which humanitarian assistance is distributed in Gaza. Israel has driven out UN humanitarian operations and replaced them with the Gaza Humanitarian Foundation, a private aid scheme coordinated with the Israeli military and delivered, in part, through US private security contractors. Israel has closed 400 UN-backed aid sites, replacing them with 4 GHF-run militarised aid hubs (primarily in the south of Gaza). The limited number of aid hubs is grossly insufficient to meet the overwhelming need for humanitarian assistance. The location of the aid hubs forces starved people seeking aid to travel excessive distances across dangerous terrain and active conflict zones, and waiting in queues many kilometres long until the aid hubs open. According to Professor Alex de Waal, an expert in starvation and famine, “. . . I’ve been working on this field of famine, food crisis and humanitarian action for more than 40 years, and there is no case, over those four decades, of such minutely engineered, closely monitored, precisely designed mass starvation of a population as is happening in Gaza today”.⁷ Professors Dannenbaum and De Waal have further warned on 30 July 2025, that:

“Conditions of life for Palestinians in Gaza are collapsing. Yesterday’s Alert from the United Nations’ Integrated food security Phase Classification (IPC) mechanism begins, “The worst-case scenario of Famine is currently playing out in the Gaza Strip.” All evidence points to a horrifying reality that the enclave has crossed the tipping point into a period of accelerating mass starvation mortality and societal devastation. As a matter of moral, legal, and basic human imperative, States with any leverage at all over the Israeli government must use that leverage now to bring this abomination to an end. To delay further does not bear contemplating. Time has run out.”⁸

6. On 22 August 2025, these dire predictions became reality: IPC Integrated Food Security Phase Classification confirmed that Famine (IPC Phase 5) is

⁵ IPC, *IPC Alert: Worst-case scenario of Famine unfolding in the Gaza Strip* (29 July 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_GazaStrip_Alert_July2025.pdf.

⁶ World Food Programme, *UN agencies warn key food and nutrition indicators exceed famine thresholds in Gaza* (29 July 2025), <https://www.wfp.org/news/un-agencies-warn-key-food-and-nutrition-indicators-exceed-famine-thresholds-gaza>.

⁷ “‘Precisely Designed Mass Starvation’: Aid Access as Weapon in Israel’s War on Gaza, Researchers Find”, *Democracy Now* (21 July 2025), https://www.democracynow.org/2025/7/21/forensic_architecture.

⁸ Tom Dannenbaum and Alex de Waal, “Time Has Run Out: Mass Starvation in Gaza and the Global Imperative”, *Just Security* (30 July 2025), <https://www.justsecurity.org/117962/mass-starvation-gaza-global-imperative/>.

currently occurring in Gaza Governate.⁹ It further predicted that famine thresholds would be crossed in Deir al-Balah and Khan Younis Governates in the coming weeks, and reported that the severity of conditions in North Gaza are similar or worse than in Gaza Governate, although lack of access to the area makes classification impossible.¹⁰ Half a million people in Gaza are now trapped in famine, marked by widespread starvation, destitution and preventable deaths, with children and women particularly affected.¹¹

7. It is for this reason that the present Dossier focuses on this particular dimension of the genocide. It has been more than a month since the situation was summarised by the UN Office of the High Commissioner for Human Rights ('OHCHR') on 3 June 2025:

“Palestinians have been presented the grimmest of choices: die from starvation or risk being killed while trying to access the meagre food that is being made available through Israel’s militarized humanitarian assistance mechanism. This militarized system endangers lives and violates international standards on aid distribution, as the United Nations has repeatedly warned. The wilful impediment of access to food and other life-sustaining relief supplies for civilians may constitute a war crime. The threat of starvation, together with 20 months of killing of civilians and destruction on a massive scale, repeated forced displacements, intolerable, dehumanizing rhetoric and threats by Israel’s leadership to empty the Strip of its population, also constitute elements of the most serious crimes under international law. In 2024, the International Court of Justice found that there was a real and imminent risk of irreparable prejudice to the rights of Palestinians in Gaza under the Convention on the Prevention and Punishment of the Crime of Genocide. The Court issued binding orders on Israel to take all necessary and effective measures to ensure, without delay, in full cooperation 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. There is no justification for failing to comply with these obligations.”¹²

⁹ IPC, *IPC: Famine review committee: Gaza Strip* (August 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_Famine_Review_Committee_Report_Gaza_Aug2025.pdf.

¹⁰ IPC, *IPC: Famine review committee: Gaza Strip* (August 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_Famine_Review_Committee_Report_Gaza_Aug2025.pdf.

¹¹ FAO, UNICEF, WFP and WHO Joint Release, ‘Famine Confirmed for the first time in Gaza’ (22 August 2025), <https://www.who.int/news/item/22-08-2025-famine-confirmed-for-first-time-in-gaza?>.

¹² United Nations Office of the High Commissioner for Human Rights ('OHCHR'), *OPT: Attacks around aid distribution site in Gaza* (3 June 2025), <https://www.ohchr.org/en/press-releases/2025/06/opt-attacks-around-aid-distribution-site-gaza?s=08>.

8. Since March 2025, Israel has broken the ceasefire agreement reached in January 2025; blocked the effective distribution of essential humanitarian aid by the UN, the Palestine Red Crescent Society ('PRCS') and other international organisations with the resources and knowledge to deliver aid effectively in Gaza; engaged a private contractor (the Gaza Humanitarian Foundation); concentrated the rationing of food at just four sites located in the south of Gaza (compared to the previous hundreds of United Nations Relief and Works Agency for Palestine Refugees ('UNRWA') sites); targeted killings of civilians as they queue for aid at these sites; and escalated its bombardment and indiscriminate killing. Israel's own figures indicate that five out of six Palestinians killed by Israeli forces in Gaza have been civilians.¹³ The death statistics grow daily and should shock everyone, as over 8 percent of Gaza's population has been either killed or injured. The number of dead children alone now stands at 18,430.¹⁴ At least 100 children have been killed through starvation.¹⁵ These acts are violations of Article II(a), (b), (c) and (d) of the Genocide Convention, and they are continuing.

9. This Dossier collates publicly available evidence of these contraventions. All the evidence is contained in reports of independent bodies, experts and the independent press. South Africa reminds member States that Israel has refused access to Gaza for independent investigations, monitoring or reporting by anyone, including the UN.¹⁶ The full extent of the violations of the Genocide Convention that have already taken place is likely much worse.

10. The Dossier also stands as a public record and collection of the speeches by Israeli leaders that make it plain that these acts are being perpetrated with open acknowledgment of the Israeli state leadership, and in express cases, under its direction and leadership. Since 18 March 2025 the Government of Israel has further expounded its intention to totally destroy the Palestinian group in Gaza, under the equally unlawful pretence that such destruction will not befall them if they accept forcible transfer to some other country or countries.

¹³ E Graham-Harrison and Yuval Abraham, 'Revealed: Israeli military's own data indicates civilian death rate of 83% in Gaza war', *The Guardian* (21 August 2025), <https://www.theguardian.com/world/ng-interactive/2025/aug/21/revealed-israeli-militarys-own-data-indicates-civilian-death-rate-of-83-in-gaza-war>.

¹⁴ UN OCHA, *Reported impact snapshot | Gaza Strip* (20 August 2025), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-20-august-2025>. See also UNICEF, *UNICEF Executive Director Catherine Russell's remarks on the humanitarian situation for children in Gaza at the UN Security Council meeting* (16 July 2025), <https://www.unicef.org/press-releases/unicef-executive-director-catherine-russells-remarks-humanitarian-situation-children>: "An average of 28 children have been killed each day — the equivalent of an entire classroom. . . every day for nearly two years."

¹⁵ Save the Children, *100 children starved to death: A needless tragedy that should shame the world* (10 August 2025), <https://www.savethechildren.net/news/100-children-starved-death-needless-tragedy-should-shame-world>.

¹⁶ See also UNRWA, @UNRWA, Tweet (8:31 pm, 22 July 2025), <https://x.com/UNRWA/status/1947726144851349654>.

11. The most significant developments in the situation are the announcement by the IPC of famine in the Gaza Strip on 22 August 2025;¹⁷ the dramatic escalation of starvation following Israel's even harsher blockade on Gaza and further weaponisation of aid;¹⁸ the approval of a new plan by the Israeli Cabinet on 5 May 2025 to 'capture' the Gaza Strip, with President Netanyahu euphemistically stating that Gaza's remaining 2.1 million population will be subject to "a mobilisation of the population in order to protect it",¹⁹ and reportedly proposing to his Cabinet a plan to Annex the Gaza Strip.²⁰ In early August 2025, Israel's Security Cabinet approved a programme for the conquest of Gaza City, with military plans — named "Gideon's Chariot's B" — approved on 20 August 2025, calling up some 60,000 Israeli reservists and escalating attacks on residential buildings and displaced Palestinians as "the systematic destruction of Gaza City is already underway".²¹

¹⁷ IPC, *IPC: Famine review committee: Gaza Strip* (August 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_Famine_Review_Committee_Report_Gaza_Aug2025.pdf.

¹⁸ Amnesty International and 114 humanitarian and human rights organisations, *As mass starvation spreads across Gaza, our colleagues and those we serve are wasting away* (23 July 2025), <https://www.amnesty.org/en/latest/news/2025/07/as-mass-starvation-spreads-across-gaza-our-colleagues-and-those-we-serve-are-wasting-away/>; OHCHR, *End unfolding genocide or watch it end life in Gaza: UN experts say States face defining choice* (7 May 2025), <https://www.ohchr.org/en/press-releases/2025/05/end-unfolding-genocide-or-watch-it-end-life-gaza-un-experts-say-states-face>; Haaretz.com, @haaretz.com, Tweet (5:23 pm, 22 July 2025), <https://x.com/haaretzcom/status/1947678797136072798>.

¹⁹ Prime Minister of Israel, Benjamin Netanyahu, @netanyahu, Tweet (4:06 pm, 5 May 2025), <https://x.com/netanyahu/status/1919393154320519246>. This was confirmed on 7 July 2025 by the statement by Israel's Defence Minister affirming the plan for 'voluntary emigration' of Palestinians in Gaza: Yaniv Kubovich and Liza Rozovsky, "Defense Minister Says Israel Plans to Concentrate All Gaza's Population in 'Humanitarian' Zone Built on Rafah's Ruins", *Haaretz* (7 July 2025), <https://www.haaretz.com/israel-news/2025-07-07/ty-article/.premium/defense-minister-israel-to-concentrate-all-gaza-population-in-rafah-humanitarian-zone/00000197-e56a-d1ad-ab97-e5ef764e0000>; Emanuel Fabian and Jacob Magid, "Katz calls for confining all Gazans in 'humanitarian city' built over Rafah's ruins", *Times of Israel* (7 July 2025), <https://www.timesofisrael.com/katz-calls-for-confining-all-gazans-in-humanitarian-city-built-over-rafahs-ruins/>.

²⁰ Chaim Levinson, "Netanyahu Proposes to Annex Parts of Gaza in Attempt to Appease Far-right Minister if Hamas Does Not Agree to a Deal", *Haaretz* (28 July 2025), <https://www.haaretz.com/israel-news/2025-07-28/ty-article/netanyahu-proposes-to-annex-gaza-in-attempt-to-appease-far-right-minister/00000198-525a-dc50-a9bf-ff7ba06f0000>; Amichai Stein, "Breaking: The Cabinet discusses annexing territories in Gaza if deal to release hostages is not reached", *i24News* (29 July 2025), <https://www.i24news.tv/he/news/israel-at-war/artc-5f6842a0>.

²¹ Jacob Magid, "Bucking IDF warnings, security cabinet approves Netanyahu plan to conquer Gaza City", *Times of Israel* (8 August 2025), <https://www.timesofisrael.com/bucking-idf-warnings-security-cabinet-approves-netanyahus-plan-to-conquer-gaza-city/>; Emanuel Fabian, "Katz approves military plans for Gaza City offensive", *Times of Israel* (20 August 2025), https://www.timesofisrael.com/liveblog_entry/katz-approves-military-plans-for-gaza-city-offensive/; United Nations Office of the High Commissioner for Human Rights ('UN OHCHR'), *UN Human Rights in Occupied Palestinian Territory: Israeli plan to take full control of Gaza city will lead to further killings and displacement* (20 August 2025), <https://reliefweb.int/report/occupied-palestinian-territory/un-human-rights-occupied-palestinian-territory-israeli-plan-take-full-control-gaza-city-will-lead-further-killings-and-displacement-enar>.

This is the reported start of a larger offensive to conquer, occupy, and take control of the entirety of the Gaza Strip.²²

12. It is now beyond debate that the final destruction of the Palestinian group in Gaza is being executed. There is an explicit intention to destroy the existence of the group by killing them and subjecting them to famine and intolerable conditions of life, or forcibly removing that group with no prospect of return — or killing and starving them under the pretence that such removal is an option.

13. Globally, political sentiment has shifted against Israel in the light of its clear genocidal plan and its open efforts to force starvation on the people of Gaza under the pretence of protecting them. On 4 June 2025 the Under Secretary-General for Humanitarian Affairs and Emergency Relief Coordinator said:

“The world is watching, day after day, horrifying scenes of Palestinians being shot, wounded or killed in Gaza while simply trying to eat.

Emergency medical teams have confirmed treating hundreds of trauma cases. Yesterday alone, dozens were declared dead at hospitals after Israeli forces said they had opened fire.

This is the outcome of a series of deliberate choices that have systematically deprived 2 million people of the essentials they need to survive.

I echo the Secretary-General’s call for immediate, independent investigations. These are not isolated incidents, and the perpetrators must be held accountable.

No one should have to risk their life to feed their children.

As I have repeatedly stressed, we must be allowed to do our jobs: We have the teams, the plan, the supplies and the experience.

Open the crossings — all of them.

Let in lifesaving aid at scale, from all directions.

Lift the restrictions on what and how much aid we can bring in.

Ensure our convoys aren’t held up by delays and denials.

Release the hostages. Implement the ceasefire.

We value the support of more and more Member States who are joining our call: Let us work.”²³

14. A Legal Letter of 26 May 2025 (by lawyers, legal academics and former Judges) in the United Kingdom has warned the Prime Minister succinctly:

²² Stav Levaton and Emanuel Fabian, “Netanyahu said set to order full takeover of Gaza, despite IDF qualms, risk to hostages”, *Times of Israel* (5 August 2025), <https://www.timesofisrael.com/netanyahu-reportedly-looking-to-order-full-takeover-of-gaza-despite-idf-qualms/>; “Netanyahu announces Israel will take control of Gaza”, *Fox News* (7 August 2025), <https://www.youtube.com/watch?v=4Yy3DsN-Z8A&t=50s>.

²³ United Nations (‘UN’), *UN Relief Chief: “No one should have to risk their life to feed their children” in Gaza* (4 June 2025), <https://www.un.org/unispal/document/un-relief-chief-no-one-should-have-to-risk-their-life-to-feed-their-children-in-gaza/>.

“All States, including the UK, are legally obliged to take all reasonable steps within their power to prevent and punish genocide; to ensure respect for international humanitarian law; and to bring to an end violations of *jus cogens* norms of international law. The UK's actions to date have failed to meet those standards.”²⁴

15. Additionally, the Madrid Group — hosted by Spain and comprising twenty European and Arab nations — is deliberating potential measures, including sanctions, to compel Israel to halt its offensive.²⁵ German Chancellor Friedrich Merz recently said “What the Israeli army is doing in the Gaza Strip, I no longer understand the goal . . . To harm the civilian population in such a way, as has increasingly been the case in recent days, can no longer be justified as a fight against terrorism.”²⁶ Speaking at the BRICS summit in Rio de Janeiro on 6 July 2025, Brazil’s President Luiz Inácio Lula da Silva stated: “We cannot remain indifferent to the genocide carried out by Israel in Gaza, the indiscriminate killing of innocent civilians and the use of hunger as a weapon of war”.²⁷ Following the IPC’s confirmation of famine in the Gaza Strip, the European Commission’s Directorate-General for European Civil Protection and Humanitarian Aid Operations emphasised that this is “a stark indication that the humanitarian situation in Gaza is beyond intolerable. People are starving, while aid is amassed on the border without reaching those who in need... Famine will cause even greater loss of life if immediate action is not taken. Every day of inaction means more civilians, including children, will die. Now is the time for Israel to allow immediate, unimpeded, and sustained humanitarian access to all people in need”.²⁸

²⁴ Letter from UK-based and/or qualified lawyers, legal academics and former judges to the United Kingdom Prime Minister (26 May 2025), <https://lawyersletter.uk/wp-content/uploads/2025/05/Gaza-letter-26May25.pdf>. In the letter, the Prime Minister was advised that: “The volume of credible reports documenting the scale and range of Israel’s actions against Palestinians both in Gaza and the West Bank, in conjunction with the ICJ’s Orders for provisional measures and the International Criminal Court (‘ICC’) arrest warrants, mean that all other States, including the UK, cannot be unaware of the serious risk – if not the actual commission – of genocide at least in Gaza. Since at least the time of the first ICJ Order the UK government has been under a duty to take all necessary measures within its capacity to prevent a genocide taking place in Gaza, an obligation subsequently only heightened as the evidence of the serious risk or commission of genocide has mounted. As a party to the Genocide Convention, the UK must comply with its obligations and take all measures within its power immediately.”

²⁵ Francesco Bortoletto, “Spain calls for sanctions on Israel over Gaza: ‘This unjust and inhuman war must stop’”, *EU News* (26 May 2025), <https://www.eunews.it/en/2025/05/26/spain-calls-for-sanctions-on-israel-over-gaza-this-unjust-and-inhuman-war-must-stop/>.

²⁶ Thomas Escritt and Andreas Rinke, “Gaza war testing Germany’s long unconditional commitment to Israel”, *Reuters* (28 May 2025), <https://www.reuters.com/world/americas/gaza-war-testing-germanys-long-unconditional-commitment-israel-2025-05-28/>.

²⁷ Al Jazeera, “Brazil’s leader Lula condemns Gaza ‘genocide’ at BRICS”, *Al Jazeera* (6 July 2025), <https://www.aljazeera.com/news/2025/7/6/brazils-leader-lula-condemns-gaza-genocide-at-brics>.

²⁸ European Civil Protection and Humanitarian Aid Operations, ‘Statement by Commissioner Lhbib on Gaza famine’ (22 August 2025), https://civil-protection-humanitarian-aid.ec.europa.eu/news-stories/news/statement-commissioner-lahbib-gaza-famine-2025-08-22_en?

16. South Africa presents this dossier to the United Nations to act to prevent genocide under Article 1 of the Genocide Convention 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.

17. The very harm that South Africa portended in December 2023 when it first initiated proceedings before the Court — and which the provisional measures of the Court sought to prevent — is being perpetrated and escalated wantonly by Israel, in open defiance of the international rule of law. The evidence in this third Security Council Dossier by South Africa shows an unrelenting Israel, with a brazen focus now on starvation that goes well beyond the already-appalling conditions of life inflicted upon the Palestinian people when South Africa last appeared before the Court, and from 28 February 2025 when South Africa presented its second Dossier to the Security Council.

18. Following this Introduction (section I), the Dossier sets out:

- Israel's failure to comply with the Court's orders and the latest situation in Gaza;
- The intensification of the pattern of denying humanitarian aid and the policy of starvation;
- The targeted killing at 'aid' (rationing) sites;
- The harm caused by the secretive Gaza Humanitarian Foundation;
- The facts of the mass population transfer and Israel's overall plan;
- Evidence of Israel's genocidal intention;
- The steps to be taken by third States and the Security Council in the light of the United Nations Secretary-General's call for independent delivery of aid: "We have the solution — a detailed plan grounded in the humanitarian principles of humanity, impartiality, neutrality, and independence."²⁹

II. ISRAEL'S FAILURE TO COMPLY WITH THE COURT'S ORDERS AND THE LATEST SITUATION IN GAZA

19. The Court has indicated ten provisional measures ordering Israel to constrain its conduct in Gaza, having determined on three separate occasions that it poses a real and imminent risk of irreparable prejudice to the rights of Palestinians under the Genocide Convention. Israel has repeatedly and flagrantly violated these Orders.

²⁹ UN News, *Guterres calls for immediate Gaza ceasefire as humanitarian crisis reaches 'horrific proportions'* (27 June 2025), <https://news.un.org/en/story/2025/06/1165016#:~:text=UN%20Secretary%2DGeneral%20Ant%C3%B3nio%20Guterres,overshadowed%20by%20other%20regional%20conflicts>.

20. In January 2024 the Court ordered Israel to “take all measures within its power to prevent the commission of all acts within the scope of Article II of [the Genocide] Convention”, as well as “ensure with immediate effect that its military does not commit any [such] acts”.³⁰ The choice of language was deliberate: having found, with references to statements made by Israeli officials indicating intent, that South Africa’s claim for Palestinians in Gaza to be protected from acts of genocide was plausibly made out against Israel,³¹ the Court ordered Israel to take all measures within its power to prevent the commission of the ‘acts’ of genocide contained in Article II of the Genocide Convention against Palestinians in Gaza (*e.g.*, killing, causing serious bodily or mental harm, imposing conditions of life calculated to bring about their destruction in whole or part).³²

21. Since then, Israel has killed at least 33,136 more Palestinians, and injured at least a further 78,558.³³ This is likely a significant undercount, with studies suggesting the real figure will be approximately 40 per cent higher,³⁴ and does not take into account the thousands missing under the rubble or the unknown (but “rapidly increasing”) number of deaths caused by disease and hunger.³⁵ What is certain however, as confirmed by multiple independent sources and methods,³⁶ is that Israel is mostly killing children and doing so at a rate that is of a magnitude higher than any other recent conflict (seven times higher in the first three weeks).³⁷

³⁰ 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 (‘Order of 26 January 2024’), p. 30, para. 86(1) and p. 31, para. 86(2).

³¹ *South Africa v. Israel*, Order of 26 January 2024, pp. 22 - 23, paras. 51 -54.

³² *South Africa v. Israel*, Order of 26 January 2024, p. 30, para. 86(1).

³³ United Nations Office for the Coordination of Humanitarian Affairs (‘UN OCHA’), *Reported impact snapshot | Gaza Strip (23 July 2025)*, <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-23-july-2025>; UN OCHA, *Hostilities in the Gaza Strip and Israel | Flash Update #103* (26 January 2024), <https://www.ochaopt.org/content/hostilities-gaza-strip-and-israel-flash-update-103>.

³⁴ Michael Spagat, Jon Pedersen, Khalil Shikaki, Michael Robbins, Eran Bendavid, Håvard Hegre, and Debarati Guha-Sapir, “Violent and Nonviolent Death Tolls for the Gaza War: New Primary Evidence” *medRxiv* (23 June 2025), <https://www.medrxiv.org/content/10.1101/2025.06.19.25329797v1.full.pdf>; Zeina Jamaluddine, Hanan Abukmail, Sarah Aly, Oona MR Campbell, and Francesco Checchi, “Traumatic injury mortality in the Gaza Strip from Oct 7, 2023, to June 30, 2024: a capture–recapture analysis” *The Lancet*, Volume 405, Issue 10477, pp. 469 - 477 (8 February 2025), [https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(24\)02678-3/fulltext](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(24)02678-3/fulltext).

³⁵ 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. 2.

³⁶ Médecins Sans Frontières (‘MSF’), “MSF survey of staff and their families in Gaza shows almost half of those killed in the war were children”, *MSF* (9 July 2025), <https://www.doctorswithoutborders.org/latest/msf-survey-staff-and-their-families-gaza-shows-almost-half-those-killed-war-were-children>;

Airwars, *Patterns of Harm Analysis: Gaza, October 2023* (12 December 2024), <https://airwars.org/research/civilian-harm-patterns-gaza-october-2023/> at Annex-2: Patterns of Death, Children. According to Airwars, Israel killed seven times more children in the first three weeks of its offensive than were killed in the most deadly months of conflicts analysed by Airwars over the past decade (including the Russian campaign in Syria, the US-led Coalition campaign against ISIS (including battlegrounds such as Mosul and Raqqa), the 2011 NATO campaign in Libya, select periods of the Russian campaign in Ukraine (the Battle of Kharkiv), and casualties in both Israel and Gaza during May 2021).

Its detention and torture of Palestinians from Gaza has meanwhile continued unabated.³⁸ By any count, Israel has manifestly violated the Court's repeated Orders not to kill or cause serious bodily or mental harm to Palestinians in Gaza.

22. Israel also continues to impose conditions of life calculated to bring about the destruction of Palestinians in Gaza, including through massive, repeated evacuation orders. According to the United Nations, 88 per cent of the Gaza Strip is either under a displacement order or forms part of Israeli-militarised zones (which largely overlap).³⁹ Israel has issued at least 60 displacement orders since 18 March 2025,⁴⁰ with "no safe place to go", Palestinians have been corralled into "overcrowded displacement sites, makeshift shelters, damaged buildings, streets and open areas", and "confined to ever-shrinking spaces".⁴¹ Forensic Architecture's analysis shows that areas to which civilians were ordered to evacuate were in many cases subsequently attacked. In some cases the attacks would occur on the same day or the day after the evacuation order.⁴²

23. The United Nations Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel ('the UN

³⁸ Tedros Adhanom Ghebreyesus, @DrTedros, Tweet (2:32 pm, 22 July 2025), <https://x.com/DrTedros/status/1947635951473426846>; Sky News, @SkyNews, Tweet (7:47 am, 22 July 2025), <https://x.com/SkyNews/status/1947534055278305757>; Anonymous, "Opinion | What Every IDF Soldier Serving at Sde Teiman Knows Is Happening to Its Palestinian Detainees", *Haaretz* (31 May 2025), <https://www.haaretz.com/opinion/2025-05-31/ty-article-opinion/.premium/what-idf-soldiers-serving-at-sde-teiman-know-is-happening-to-its-palestinian-detainees/00000196-eda1-d86e-abb7-fdbbf8570000>; Palestinian Centre for Human Rights – PCHR, @PCHRGaza, Tweet (11:42 am, 1 June 2025), <https://x.com/pchrgaza/status/1929111396521812370>; PCHR, *Torture and Genocide* (October 2023–October 2024) (12 May 2025), <https://pchrgaza.org/wp-content/uploads/2025/05/Torture-and-Genocide-The-Shattered-Futures-of-Former-Palestinian-Detainees-in-Gaza.pdf>; Chen Maanit, "Israeli Gov't Withholds Details on Palestinian Prisoners Despite High Court Order", *Haaretz* (12 June 2025), <https://www.haaretz.com/israel-news/2025-06-12/ty-article/.premium/israeli-govt-withholds-details-on-palestinian-prisoners-despite-high-court-order/00000197-5f88-df0f-add7-ffaad82d0000>; Save the Children UK, @savethechildrenUK, Instagram (3 July 2025) https://www.instagram.com/p/DLpys4aMv-Y/?img_index=1; Sam Mednick and Samy Magdy, "Israeli use of human shields in Gaza was systematic, soldiers and former detainees tell the AP", *AP* (24 May 2025), <https://apnews.com/article/israel-palestinians-hamas-war-army-human-shields-80f358dd2c87a1123f26ffada159701c>.

³⁹ UN OCHA, *Humanitarian Situation Update #307 | Gaza Strip* (23 July 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-307-gaza-strip>.

⁴⁰ IPC, *IPC Alert: Worst-case scenario of Famine unfolding in the Gaza Strip* (29 July 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_GazaStrip_Alert_July2025.pdf.

⁴¹ UN OCHA, *Humanitarian Situation Update #306 | Gaza Strip* (16 July 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-306-gaza-strip>; UN OCHA, *Humanitarian Situation Update #307 | Gaza Strip* (23 July 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-307-gaza-strip>.

⁴² Forensic Architecture, *Attacks following evacuation orders, in areas where civilians were directed to*, <https://frames.forensic-architecture.org/gaza/updates/attacks-following-evacuation-orders-in-areas-where-civilians-were-directed-to>; Forensic Architecture, *Confirmed attacks and evacuation orders since 18 March 2025*, <https://frames.forensic-architecture.org/gaza/updates/confirmed-attacks-and-evacuation-orders-since-18-march-2025>.

Commission of Inquiry’),⁴³ multiple United Nations human rights experts and special rapporteurs,⁴⁴ leading international human rights organisations,⁴⁵ and international legal scholars across jurisdictions have concluded that Israel has systematically and continuously committed genocidal acts in violation of the Provisional Measures ordered by the Court.

24. When it became clear that Israel intended to starve the Palestinians that it did not shoot, shell or snipe, the Court issued further Provisional Measures on 28 March 2024, observing that “Palestinians in Gaza are no longer facing only a risk of famine, ... famine is setting in”⁴⁶ and unanimously ordering Israel to:

“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...”

25. In what would become a recurring tactic, Israel responded by temporarily increasing the amount of aid allowed to enter in Gaza while it was under an obligation to report to the Court — illustrating its ability to do so at will — but began to throttle aid once oversight and international pressure had eased.⁴⁷ This

⁴³ UN Human Rights Council (‘UN HRC’), Report of the Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel, A/HRC/59/26 (6 May 2025), <https://docs.un.org/en/A/HRC/59/26> (‘Commission of Inquiry Report (6 May 2025)’), p. 18, para. 98 (d).

⁴⁴ 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>; UN OHCHR, *End unfolding genocide or watch it end life in Gaza: UN experts say States face defining choice* (7 May 2025), <https://www.ohchr.org/en/press-releases/2025/05/end-unfolding-genocide-or-watch-it-end-life-gaza-un-experts-say-states-face>.

⁴⁵ Amnesty International, *Israel/Occupied Palestinian Territory: ‘You Feel Like You Are Subhuman’: Israel’s Genocide Against Palestinians in Gaza* (5 December 2024), <https://www.amnesty.org/en/documents/mdl15/8668/2024/en/>; Human Rights Watch (‘HRW’), “Israel’s Crime of Extermination, Acts of Genocide in Gaza”, *HRW* (19 December 2024), <https://www.hrw.org/news/2024/12/19/israels-crime-extermiation-acts-genocide-gaza>.

⁴⁶ Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (*South Africa v. Israel*), Order of 28 March 2024 (‘Order of 28 March 2024’), p. 520, para. 21.

⁴⁷ Robert Blecher and Chris Newton, “The Gaza Starvation Experiment”, *International Crisis Group* (6 June 2025), <https://www.crisisgroup.org/middle-east-north-africa/east-mediterranean-mena/israelpalestine/gaza-starvation-experiment> noted that “When the UN and others have warned of imminent famine, as they did in March and November 2024, Israel briefly relaxed some controls to increase the flow of supplies, only to tighten them again after international attention faded.”

genocidal practice has been confirmed by President Netanyahu himself.⁴⁸ Israel simultaneously sought to discredit the independent and internationally-accepted food security monitors relied upon by the Court, and obstruct the access to and information from Gaza required to assess the conditions of famine and starvation.

26. Israel has placed Gaza under a renewed near-total humanitarian blockade since 2 March 2025, confirming its resolve to prevent, including through force, any other actor from providing humanitarian assistance — as long as the international community’s inaction enables it to do so.

27. Despite being specifically ordered by the Court to act “in full co-operation with the United Nations”,⁴⁹ Israel carried out its threat of shutting down UNRWA in January 2025, which was “the backbone of the humanitarian response in Gaza”.⁵⁰ As detailed below, the Gaza Humanitarian Foundation (‘GHF’) — established by Israel to replace UNRWA — has not only failed, it has become an instrument of more death.

28. The Court’s Orders of January and March demanding the immediate provision of “basic services and humanitarian assistance”⁵¹ were not limited to food assistance, they included the provision of “water, electricity, fuel, shelter, clothing, hygiene and sanitation requirements, as well as medical supplies and medical care”.⁵² Israel has breached these too. According to the United Nations, 93 per cent of households in Gaza have experienced water insecurity.⁵³ In a joint statement issued on 12 July 2025, multiple United Nations agencies along with the World Health Organization and World Food Programme issued a joint statement warning that “the fuel shortage in Gaza has reached critical levels” and that “[w]ithout adequate fuel, UN agencies responding to this crisis will likely be forced to stop their operations entirely, directly impacting all essential services in Gaza”.⁵⁴ After months of blockade, and in the face of renewed Israeli operations in and around medical facilities, the collapse of the health system in Gaza is “imminent”: essential medical supplies are depleted, medical professionals continue to be kidnapped or

⁴⁸ Debora Patta, Tucker Reals and Agnes Reau, ‘Israel lets limited aid into Gaza, as Netanyahu says allies can’t tolerate “images of mass famine”’, *CBS News* (20 May 2025), <https://www.cbsnews.com/news/israel-gaza-war-netanyahu-faces-sanctions-threat-palestinians-starvation/>.

⁴⁹ *South Africa v. Israel*, Order of 28 March 2024.

⁵⁰ UNRWA, UNRWA in Gaza the backbone of humanitarian response (December 2024), https://www.unrwa.org/sites/default/files/content/resources/unrwa_the_backbone_of_the_humanitarian_response_-_factsheet_en2.pdf.

⁵¹ *South Africa v. Israel*, Order of 26 January 2024, p. 31, para. 86(4); *South Africa v. Israel*, Order of 28 March 2024, p. 527, para. 51((2)(a).

⁵² *South Africa v. Israel*, Order of 28 March 2024, p. 527, para. 51((2)(a).

⁵³ UN OCHA, *Reported impact snapshot | Gaza Strip (9 July 2025)* (9 July 2025), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-9-july-2025>.

⁵⁴ UN OCHA et al., *Joint statement by OCHA, OHCHR, UNDP, UNFPA, UNICEF, UNOPS, UNRWA, WFP and WHO on fuel shortage in Gaza* (12 July 2025), <https://www.ochaopt.org/content/joint-statement-ocha-undp-unfpa-unops-unrwa-wfp-and-who-fuel-shortage-gaza>.

killed, and increasingly starved.⁵⁵ Only a third of the hospitals are still partly or barely functioning and the two biggest hospitals — Al-Shifa and Nasser — have announced that they will soon have to close.⁵⁶ According to the World Health Organization, more than 10,000 people require medical evacuation from Gaza, but since 18 March 2025 only eight evacuations have taken place.⁵⁷

29. In January 2024 the Court ordered Israel to “prevent the destruction and ensure the preservation of evidence” relating to alleged violations of the Genocide Convention,⁵⁸ which it subsequently amplified on 24 May 2024 by ordering Israel to “[t]ake 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”.⁵⁹ On the basis of that Order, the UN Commission of Inquiry once again requested access to Gaza in order to investigate allegations of genocide. Israel continues to refuse access to the UN Commission of Inquiry in violation of the Court’s Order of 24 May 2024. No international fact-finding body, investigators or journalists have been permitted access to the Gaza Strip,⁶⁰ as Israel has escalated its denial of visas for international staff members of humanitarian organisations,

⁵⁵ Philippe Lazzarini, @UNLazzarini, Tweet (6:58 pm, 21 July 2025), <https://x.com/UNLazzarini/status/1947340417332064511>; PRCS, @PalestineRCS, Tweet (6:57 pm, 21 July 2025), <https://x.com/PalestineRCS/status/1947340129787420940>; UN OHCHR, *Killing of medical professionals in Gaza* (16 July 2025), <https://reliefweb.int/report/occupied-palestinian-territory/killing-medical-professionals-gaza-16-july-2025>; UN OHCHR, *OPT: UN Human Rights Office condemns targeting Journalists and attacks on hospitals* (6 June 2025), <https://reliefweb.int/report/occupied-palestinian-territory/opt-un-human-rights-office-condemns-targeting-journalists-and-attacks-hospitals-enar>.

⁵⁶ Nir Hasson, Jack Khoury and Rawan Suleiman, “No Cancer Care, No Dialysis, No power: Gaza’s health system is on the brink of collapse”, *Haaretz* (10 July 2025), <https://www.haaretz.com/israel-news/2025-07-10/ty-article-magazine/premium/no-cancer-care-no-dialysis-no-power-gazas-health-system-is-on-the-brink-of-collapse/00000197-f445-dc05-a59f-f56f7ae80000> noting that: “Gaza now has roughly half the number of hospital beds it did before the war, fewer than 50% of its operating rooms, just a third of its CT scanners, and none of the seven MRI machines that once existed”. See also Médecins sans Frontières (‘MSF’), *Gaza Humanitarian Foundation aid distribution system must be dismantled* (27 June 2025), <https://www.doctorswithoutborders.org/latest/gaza-humanitarian-foundation-aid-distribution-system-must-be-dismantled>.

⁵⁷ UN, *Update on the challenged lifelines in Gaza — WHO & OHCHR* (4 July 2025), <https://www.un.org/unispal/document/update-on-the-challenged-lifelines-in-gaza-who-ohchr/>; UN OCHA, *Humanitarian Situation Update #307 | Gaza Strip* (23 July 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-307-gaza-strip>.

⁵⁸ *South Africa v. Israel*, Order of 26 January 2024, p. 31, para. 86(5).

⁵⁹ Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (*South Africa v. Israel*), Order of 24 May 2024 (‘Order of 24 May 2024’), *I.C.J. Reports* 2024, p. 666, para. 57(2)(c).

⁶⁰ See also AFP, *Joint statement on Gaza from AFP, AP, BBC, Reuters* (24 July 2025), <https://www.ap.org/the-definitive-source/announcements/joint-statement-on-gaza-from-afp-ap-bbc-reuters/>; Stav Levaton, “Foreign journalists step up push for access to Gaza, express fear for hungry colleagues”, *Times of Israel* (30 July 2025), <https://www.timesofisrael.com/foreign-journalists-step-up-push-for-access-to-gaza-express-fear-for-hungry-colleagues/>.

including for reporting on the situation in Gaza.⁶¹ In the words of the United Nations Under-Secretary-General for Humanitarian Affairs: “Each time that we report on what we see, we face threats of further reduced access to the civilians we are trying to serve.”⁶²

30. The Court has also ordered Israel to “take all measures within its power to prevent and punish the direct and public incitement to commit genocide”.⁶³ Israel has not only failed to take any concrete steps towards meeting this obligation, or the obligation to punish genocide under the Genocide Convention, it has continued to reward and promote those who publicly incite genocide and the disregard of the basic principles of international law governing the conduct of hostilities. Multiple reports from Israeli soldiers confirm that they have been allowed and even encouraged to transgress these basic principles — and the Court’s Orders — in the knowledge that they will not be punished.⁶⁴ Israel has also systematically undermined the ability of other bodies to investigate violations of the Genocide Convention, including journalists and civil society organisations.⁶⁵

31. Since May 2024 Israel has destroyed Rafah and displaced approximately 1.2 million of its inhabitants, in direct violation of the Court’s Order that it “[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

⁶¹ UNRWA, @UNRWA, Tweet (8:31 pm, 22 July 2025), <https://x.com/UNRWA/status/1947726144851349654>; Ariel Kahana, “Following tendentious conduct against Israel: Foreign Minister orders expulsion of senior UN official”, *Israel Hayom* (20 July 2025), <https://www.israelhayom.co.il/news/geopolitics/article/18452208>; “In light of Whittall’s tendentious anti-Israel approach and his recent statements, Minister Saar ordered to terminate his activity and not renew his visa to stay in Israel.”; Pass Blue, @pass_blue, Tweet (4:55 pm, 23 July 2025), https://x.com/pass_blue/status/1948034209265672693.

⁶² UN OCHA, *Security Council briefing by Tom Fletcher, Under-Secretary-General for Humanitarian Affairs, on the Middle East* (16 July 2025), <https://www.ochaopt.org/content/security-council-briefing-tom-fletcher-under-secretary-general-humanitarian-affairs-middle-east>.

⁶³ *South Africa v. Israel*, Order of 26 January 2024, p. 31, para. 86(1)(3).

⁶⁴ James Mackenzie, “Israeli soldiers describe clearance of ‘kill zone’ on Gaza’s edge”, *Reuters* (7 April 2025), <https://www.reuters.com/world/middle-east/israeli-soldiers-describe-clearance-kill-zone-gazas-edge-2025-04-07/>. Associated Press, *Israeli Use of Human Shields in Gaza Was Systematic, Soldiers and Former Detainees Tell the AP* (24 May 2025) <https://apnews.com/article/80f358dd2c87a1123f26ffada159701c>; Alex Rossi, Orly Halpern and Celine Alkhalidi, *Israeli soldier describes arbitrary killing of civilians in Gaza* (7 July 2025), <https://news.sky.com/story/israeli-soldier-describes-arbitrary-killing-of-civilians-in-gaza-13393422>. See also e.g. <https://www.972mag.com/double-tap-israel-gaza-airstrikes-rescue/>.

⁶⁵ UNRWA, @UNRWA, Tweet (8:31 pm, 22 July 2025), <https://x.com/UNRWA/status/1947726144851349654>.

that could bring about its physical destruction in whole or in part”.⁶⁶ Israel is now once more directing Palestinians towards Rafah, where they will be housed in “de-facto . . . massive concentration camps” established on its ruins.⁶⁷

32. Despite these Orders requiring *necessary, immediate and effective* action *over a year ago*, Israel has failed to comply with them. Israel has instead taken steps to the contrary — to intensify its deprivation of urgently needed basic services and aid to Palestinians in Gaza by closing and maintaining closed aid crossings, increasing manifold its systematic attacks on hungry and desperate Gazans seeking aid, banning and otherwise actively preventing a UN agency (UNRWA) from delivering life-saving aid and basic services, corralling Palestinians into militarised zones through the weaponisation of aid, and continued — at a significant intensity — its campaign of deliberately starving the Palestinian population. All amidst constant bombardment and shootings including repeated attacks on displaced Palestinians in tents, schools and other shelters.⁶⁸

III. THE INTENSIFICATION OF THE PATTERN OF DENYING HUMANITARIAN AID AND THE POLICY OF STARVATION

33. Israel has engaged in an unmistakeable intensification of its pattern and policy of denying Palestinians in Gaza humanitarian aid and systematically starving them, to the point that the IPC has confirmed that famine thresholds have been crossed in the Gaza Governate, and are expected to be crossed in Deir al-Balah and Khan Younis Governates in the coming weeks.⁶⁹ The United Nations Secretary-General has condemned the famine as a “man-made disaster”, a “failure of

⁶⁶ *South Africa v. Israel*, Order of 24 May 2024, p. 15, paras. 57(2)(a); Nir Hasson, Yarden Michaeli, and Avi Scharf, “Rafah Is Gone. Razed to the Ground. And It's Not the Only City Wiped Out by the Israeli Army”, *Haaretz* (12 June 2025), <https://www.haaretz.com/israel-news/2025-06-12/ty-article-magazine/.premium/rafah-is-gone-razed-to-the-ground-its-not-the-only-city-decimated-by-the-israeli-army/00000197-6506-db73-aff7-7d4ee6bb0000>; Nir Hasson, “New Satellite Data Shows: Gaza Devastation Scale Greater Than Estimated, at Least 70 Percent of Buildings Leveled”, *Haaretz* (17 July 2025), <https://www.haaretz.com/israel-news/2025-07-17/ty-article-magazine/.premium/satellite-data-shows-at-least-70-percent-of-gaza-buildings-leveled/00000198-12de-d9c7-af98-7adffc8f0000>: “89% of the buildings in Rafah . . . have been completely or partially destroyed”.

⁶⁷ Phillipe Lazzarini, @UNLazzarini, Tweet (5:05 pm, 9 July 2025), <https://x.com/UNLazzarini/status/1942963411991535688>.

⁶⁸ See e.g. UN OCHA, *Humanitarian Situation Update #304 | Gaza Strip* (9 July 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-304-gaza-strip>; UN OHCHR, *Gaza: Israel continues to kill entire displaced families in area it designated as “safe”* (27 June 2025), <https://reliefweb.int/report/occupied-palestinian-territory/gaza-israel-continues-kill-entire-displaced-families-area-it-designated-safe-enar>; UN OHCHR, *UN Human Rights Office - OPT: More than fifty per cent of people killed in Gaza this week were in shelters and residential buildings* (22 May 2025), <https://reliefweb.int/report/occupied-palestinian-territory/un-human-rights-office-opt-more-fifty-cent-people-killed-gaza-week-were-shelters-and-residential-buildings>.

⁶⁹ IPC, *IPC: Famine review committee: Gaza Strip* (August 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_Famine_Review_Committee_Report_Gaza_Aug2025.pdf.

humanity” and called urgently for a ceasefire and unfettered humanitarian access.⁷⁰ The United Nations Under-Secretary-General for Humanitarian Affairs stated “[w]e are beyond vocabulary to describe conditions in Gaza . . . Israel, as the occupying power, is obligated to ensure that people have food and medical supplies. But that is not happening. Instead, civilians are exposed to death and injury, forcible displacement, stripped of dignity.”⁷¹ There is no rational explanation for why Israel has “weaponised hunger”,⁷² but for providing clear evidence of its genocidal intent to deliberately inflict conditions of life calculated to destroy Palestinians in Gaza. As the Head of United Nations Office for the Coordination of Humanitarian Affairs (‘UN OCHA’) put it, “it appears to be the erasure of Palestinian life from Gaza”.⁷³

1. Blocking the entry of aid

34. At the time of this Dossier’s preparation, “[h]umanitarian operations continue to be strangled”.⁷⁴ Israel’s performative steps have not resulted in a

⁷⁰ UN News, *Secretary-General – on famine in Gaza* (22 August 2025), <https://www.un.org/sg/en/content/sg/statement/2025-08-22/secretary-general-famine-gaza>.

⁷¹ UN OCHA, *Security Council briefing by Tom Fletcher, Under-Secretary-General for Humanitarian Affairs, on the Middle East* (16 July 2025), <https://www.ochaopt.org/content/security-council-briefing-tom-fletcher-under-secretary-general-humanitarian-affairs-middle-east>.

⁷² UN News, *Gaza: UN warns of ‘weaponised hunger’ and growing death toll amid food chaos* (22 June 2025), <https://news.un.org/en/story/2025/06/1164761>; UN OCHA, *Briefing by Jonathan Whittall, Head of OCHA OPT, to journalists in Deir al Balah, Gaza Strip* (22 June 2025), <https://www.ochaopt.org/content/briefing-jonathan-whittall-head-ocha-opt-journalists-deir-al-balah-gaza-strip>.

⁷³ UN OCHA, *Briefing by Jonathan Whittall, Head of OCHA OPT, to journalists in Deir al Balah, Gaza Strip* (22 June 2025), <https://www.ochaopt.org/content/briefing-jonathan-whittall-head-ocha-opt-journalists-deir-al-balah-gaza-strip>. After the issuance of this statement Israel decided not to renew his visa, see Ariel Kahana, “Following tendentious conduct against Israel: Foreign Minister orders expulsion of senior UN official”, *Israel Hayom* (20 July 2025), <https://www.israelhayom.co.il/news/geopolitics/article/18452208>: “In light of Whittall’s tendentious anti-Israel approach and his recent statements, Minister Saar ordered to terminate his activity and not renew his visa to stay in Israel.”; Pass Blue, @pass_blue, Tweet (4:55 pm, 23 July 2025), https://x.com/pass_blue/status/1948034209265672693.

⁷⁴ UN OCHA, *Secretary-General’s press encounter on the situation in Gaza* (27 June 2025), <https://www.ochaopt.org/content/secretary-generals-press-encounter-situation-gaza>; Amnesty International and 114 Aid Organisations, *As mass starvation spreads across Gaza, our colleagues and those we serve are wasting away* (23 July 2025), <https://www.amnesty.org/en/latest/news/2025/07/as-mass-starvation-spreads-across-gaza-our-colleagues-and-those-we-serve-are-wasting-away/>.

significant and adequate increase of aid entry,⁷⁵ with the United Nations Secretary General reiterating that “[t]he trickle of aid must become an ocean. Food, water, medicine and fuel must flow in waves and without obstruction. This nightmare must end”.⁷⁶ This has direct consequences for Palestinians in Gaza as “[b]locking aid starves civilians. It leaves them without basic medical support. It strips them of dignity and hope. It inflicts a cruel collective punishment. *Blocking aid kills.*”⁷⁷

35. On 2 March 2025, Israeli authorities took a deliberate decision to block *all* humanitarian aid from entering Gaza,⁷⁸ re-imposing a total siege on the entry of aid and other life-saving supplies for approximately 80 days.⁷⁹ This was a massive intensification of the denial of aid recorded in South Africa’s Letter of 27 February 2025 to the Security Council.⁸⁰ Subsequently, since 19 May 2025, Israel has only

⁷⁵ UN OCHA, *Statement on Gaza by Tom Fletcher, Under-Secretary-General for Humanitarian Affairs and Emergency Relief Coordinator* (27 July 2025), <https://www.ochaopt.org/content/statement-gaza-tom-fletcher-under-secretary-general-humanitarian-affairs-and-emergency-relief-coordinator-2>. Only one crossing (Zikim) has partially reopened, and it was before the EU-Israel deal. On 20 July 2025, a WFP convoy using Zikim came under fire from Israeli tanks and snipers, resulting in large casualties. WFP paused aid movements through Zikim the next day, see: Alessandro Mario Amoroso, @amoroso_aless, Tweet (3:28 pm, 29 July 2025), https://x.com/amoroso_aless/status/1950186756927582305; World Food Programme (‘WFP’), *Gaza Convoy Incident Statement* (20 July 2025), <https://www.wfp.org/news/gaza-convoy-incident-statement>; UN OCHA, *Gaza Humanitarian Response Update | 6 – 19 July 2025* (22 July 2025), <https://www.ochaopt.org/content/gaza-humanitarian-response-update-6-19-july-2025>. See also, for what might be adequate, IPC, *IPC Alert: Worst-case scenario of Famine unfolding in the Gaza Strip* (29 July 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_GazaStrip_Alert_July2025.pdf; and — presuming an end to Israel’s military operations: UN OCHA, *Considerations for the delivery of humanitarian aid during a ceasefire in Gaza* (25 July 2025), <https://www.ochaopt.org/content/considerations-delivery-humanitarian-aid-during-ceasefire-gaza>.

⁷⁶ UN Meetings Coverage and Press Releases, *Citing Integrated Food Security Phase Classification Alert That Gaza Is on Brink of Famine, Secretary-General Stresses ‘Trickle of Aid Must Become an Ocean’* (29 July 2025) <https://press.un.org/en/2025/sgsm22748.doc.htm>

⁷⁷ UN OCHA, *Statement on Gaza by Tom Fletcher, Under-Secretary-General for Humanitarian Affairs and Emergency Relief Coordinator* (1 May 2025), <https://www.ochaopt.org/content/statement-gaza-tom-fletcher-under-secretary-general-humanitarian-affairs-and-emergency-relief-coordinator-0> (emphasis added).

⁷⁸ UN OCHA, *Humanitarian Situation Update #269 | Gaza Strip* (4 March 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-269-gaza-strip>; See also, UN OCHA, *Statement on Gaza by Tom Fletcher, Under-Secretary-General for Humanitarian Affairs and Emergency Relief Coordinator* (1 May 2025), <https://www.ochaopt.org/content/statement-gaza-tom-fletcher-under-secretary-general-humanitarian-affairs-and-emergency-relief-coordinator-0>.

⁷⁹ UNRWA, *UNRWA Situation Report #178 On The Humanitarian Crisis In The Gaza Strip And The West Bank, Including East Jerusalem* (4 July 2025), <https://www.unrwa.org/resources/reports/unrwa-situation-report-178-situation-gaza-strip-and-west-bank-including-east-jerusalem>.

⁸⁰ Letter from the Permanent Representative of South Africa to the United Nations addressed to the President of the Security Council, S/2025/130, UNSC (28 February 2025), <https://www.un.org/unispal/document/letter-from-south-africa-public-dossier-of-openly-available-evidence-on-the-state-of-israels-acts-of-genocide-against-the-palestinians-in-gaza/>, pp. 22 - 24, paras. 46 and 48.

allowed a handful of organisations to bring in a trickle of aid,⁸¹ denying more requests for coordination than those it has accepted.⁸² Community kitchens are running out of supplies for meals; nutritional programmes have run out of nutrition supplies.⁸³ No aid crossing has been maintained open on a consistent basis,⁸⁴ despite tons of lifesaving supplies waiting just outside these crossings,⁸⁵ and despite the United Nations continued calls for “full, safe and sustained humanitarian access”⁸⁶ amid escalating starvation and deprivation. Aid supplies remain vastly insufficient, inconsistent and inaccessible compared to the need.⁸⁷

36. Israel purports to justify the restriction of aid on the argument that Hamas steals it to use as a weapon of control over the population. However, senior Israeli military officials have admitted that the Israeli military has never found proof that the Palestinian militant group had systematically stolen aid from the United Nations, the biggest supplier of emergency assistance to Gaza for most of the war. On the contrary, the Israeli military officials said, the United Nations aid delivery system, which Israel derided and undermined, was largely effective in providing food to Gaza’s desperate and hungry population.⁸⁸ An internal U.S. government analysis by

⁸¹ UNRWA, *UNRWA Situation Report #178 On The Humanitarian Crisis In The Gaza Strip And The West Bank, Including East Jerusalem* (4 July 2025), <https://www.unrwa.org/resources/reports/unrwa-situation-report-178-situation-gaza-strip-and-west-bank-including-east-jerusalem>.

⁸² UN OCHA, *Reported impact snapshot | Gaza Strip* (9 July 2025), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-9-july-2025>.

⁸³ World Central Kitchen (‘WCK’), *WCK Forced to Pause Cooking in Gaza, But Baking and Water Delivery Continue for Communities* (20 July 2025), <https://wck.org/news/gaza-update-7-20>; IPC, *IPC Alert: Worst-case scenario of Famine unfolding in the Gaza Strip* (29 July 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_GazaStrip_Alert_July2025.pdf.

⁸⁴ See comparison of various UN OCHA reports: UN OCHA, *Reported impact snapshot | Gaza Strip* (2 July 2025), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-2-july-2025>; UN OCHA, *Reported impact snapshot | Gaza Strip* (4 June 2025), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-4-june-2025>; UN OCHA, *Reported impact snapshot | Gaza Strip* (7 May 2025), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-7-may-2025>; UN OCHA, *Reported impact snapshot | Gaza Strip* (8 April 2025), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-8-april-2025>; UN OCHA, *Reported impact snapshot | Gaza Strip* (4 March 2025), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-4-march-2025>.

⁸⁵ Amnesty International, *Gaza: Evidence points to Israel’s continued use of starvation to inflict genocide against Palestinians* (3 July 2025), <https://www.amnesty.org/en/latest/news/2025/07/gaza-evidence-points-to-israels-continued-use-of-starvation-to-inflict-genocide-against-palestinians/>; Amnesty International and 114 humanitarian and human rights organisations, *As mass starvation spreads across Gaza, our colleagues and those we serve are wasting away* (23 July 2025), <https://www.amnesty.org/en/latest/news/2025/07/as-mass-starvation-spreads-across-gaza-our-colleagues-and-those-we-serve-are-wasting-away/>.

⁸⁶ UN OCHA, *Statement attributable to the Spokesperson for the Secretary-General - on the humanitarian crisis in Gaza* (3 July 2025), <https://www.ochaopt.org/content/statement-attributable-spokesperson-secretary-general-humanitarian-crisis-gaza>.

⁸⁷ FAO, UNICEF, WFP and WHO, *Famine confirmed for first time in Gaza* (22 August 2025), <https://www.who.int/news/item/22-08-2025-famine-confirmed-for-first-time-in-gaza?>.

⁸⁸ Natan Odenheimer, “No proof Hamas routinely stole U.N. Aid, Israeli Military Officials Say”, *New York Times* (26 July 2025), <https://www.nytimes.com/2025/07/26/world/middleeast/hamas-un-aid-theft.html>. See also Jonathan Landy, “Exclusive: USAID analysis found no evidence of massive Hamas theft of Gaza aid”, *Reuters* (25 July 2025), <https://www.reuters.com/world/middle-east/usa-id-analysis-found-no-evidence-massive-hamas-theft-gaza-aid-2025-07-25/>.

the U.S. Agency for International Development (‘USAID’) also found no evidence of systematic theft by the Palestinian militant group Hamas of U.S.-funded humanitarian supplies.⁸⁹

2. Militarising and shrinking aid distribution

37. In an intensification of its previous impediments to the distribution of aid within Gaza,⁹⁰ Israel has largely shut down or obstructed existing aid distribution networks into and within Gaza — and replaced numerous and widespread non-militarised United Nations aid distribution sites with a fraction of militarised aid distribution sites under the control of the Israeli military.⁹¹ Named the Gaza Humanitarian Foundation (‘GHF’),⁹² the operation has been described by the United Nations Emergency Relief Coordinator as a “cynical sideshow” and “[a] fig leaf for further violence and displacement”.⁹³ This has been confirmed by over 100 humanitarian aid organisations and NGOs operating in Gaza, who have jointly stated that “[t]he 400 aid distribution points operating during the temporary ceasefire across Gaza have now been replaced by just four military-controlled distribution sites, forcing two million people into overcrowded, militarized zones where they face daily gunfire and mass casualties while trying to access food and are denied other life-saving supplies”.⁹⁴ Three of these distribution points are in Rafah, within militarised zones covered by evacuation orders in Rafah, and one is in Gaza City. *None* are in Northern Gaza.⁹⁵ Starved Palestinians, of which the most weak and vulnerable will not manage, are forced to walk kilometres in order to join a stampede for food of low nutritional value and diversity, that requires cooking with water and fuel unavailable.⁹⁶ The IPC’s Famine Review Committee has stated

⁸⁹ Jonathan Landay, “Exclusive: USAID analysis found no evidence of massive Hamas theft of Gaza aid”, *Reuters* (25 July 2025), <https://www.reuters.com/world/middle-east/usaaid-analysis-found-no-evidence-massive-hamas-theft-gaza-aid-2025-07-25/>.

⁹⁰ Letter from the Permanent Representative of South Africa to the United Nations addressed to the President of the Security Council, S/2025/130, UNSC (28 February 2025), p. 25, para. 51.

⁹¹ UN OCHA, *Statement by the Humanitarian Country Team of the Occupied Palestinian Territory — on principled aid delivery in Gaza* (4 May 2025), <https://www.ochaopt.org/content/statement-humanitarian-country-team-occupied-palestinian-territory-principled-aid-delivery-gaza>; UN OCHA, *Humanitarian Situation Update #302 | Gaza Strip* (2 July 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-302-gaza-strip>.

⁹² Gaza Humanitarian Foundation (‘GHF’), <https://ghf.org/>.

⁹³ UN News, ‘*Stop the 21st century atrocity*’ in Gaza, *Fletcher urges UN Security Council* (13 May 2025), <https://news.un.org/en/story/2025/05/1163206>. See also Forensic Architecture, @ForensicArchi, Tweet (7:02 pm, 18 July 2025), <https://x.com/ForensicArchi/status/1946254211735310444>.

⁹⁴ Norwegian Refugee Council, *Gaza: Starvation or gunfire - not a humanitarian response* (1 July 2025), <https://www.nrc.no/news/2025/july/gaza-starvation-or-gunfire-not-a-humanitarian-response>.

⁹⁵ Al Jazeera Staff, “Visual guide to how the Gaza aid distribution turmoil unfolded”, *Al Jazeera* (29 May 2025), <https://www.aljazeera.com/news/longform/2025/5/29/visual-guide-to-how-the-gaza-aid-distribution-turmoil-unfolded>; Alex de Waal, “Israel’s food points are not just death traps — they’re an alibi for the starvation of Gaza”, *The Guardian* (26 July 2025), <https://www.theguardian.com/commentisfree/2025/jul/26/israel-food-starvation-gaza-famine-aid>.

⁹⁶ Alex de Waal, “Israel’s food points are not just death traps — they’re an alibi for the starvation of Gaza”, *The Guardian* (26 July 2025), <https://www.theguardian.com/commentisfree/2025/jul/26/israel-food-starvation-gaza-famine-aid>.

that “analysis of the food packages supplied by the GHF shows that their distribution plan would lead to mass starvation, even if it was able to function without the appalling levels of violence that have been reported.”⁹⁷

38. In terms of the conduct of this operation, the United Nations has stated categorically that this operation, “contravenes fundamental humanitarian principles and appears designed to reinforce control over life-sustaining items as a pressure tactic — as part of a military strategy.”⁹⁸ It has also stressed that the United Nations *already* has the supplies, the networks, the experience and a plan that is “grounded in the humanitarian principles of humanity, impartiality, neutrality, and independence”.⁹⁹ Not only does “the latest modality proposed by Israeli authorities” not meet the minimum bar for principled delivery of humanitarian aid;¹⁰⁰ it in effect constitutes a “sadistic death trap”,¹⁰¹ by design.¹⁰²

⁹⁷ IPC, *IPC Alert: Worst-case scenario of Famine unfolding in the Gaza Strip* (29 July 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_GazaStrip_Alert_July2025.pdf. See also Alex de Waal, “Israel’s food points are not just death traps – they’re an alibi for the starvation of Gaza”, *The Guardian* (26 July 2025), <https://www.theguardian.com/commentisfree/2025/jul/26/israel-food-starvation-gaza-famine-aid>.

⁹⁸ UN OCHA, *Statement by the Humanitarian Country Team of the Occupied Palestinian Territory — on principled aid delivery in Gaza* (4 May 2025), <https://www.ochaopt.org/content/statement-humanitarian-country-team-occupied-palestinian-territory-principled-aid-delivery-gaza>.

⁹⁹ UN OCHA, *Secretary-General’s press encounter on the situation in Gaza* (27 June 2025), <https://www.ochaopt.org/content/secretary-generals-press-encounter-situation-gaza>; UN OCHA, *Statement attributable to the Spokesperson for the Secretary-General - on the humanitarian crisis in Gaza* (3 July 2025), <https://www.ochaopt.org/content/statement-attributable-spokesperson-secretary-general-humanitarian-crisis-gaza>.

¹⁰⁰ UN OCHA, *Statement on Gaza by Tom Fletcher, Under-Secretary-General for Humanitarian Affairs and Emergency Relief Coordinator* (1 May 2025), <https://www.ochaopt.org/content/statement-gaza-tom-fletcher-under-secretary-general-humanitarian-affairs-and-emergency-relief-coordinator-0>. This has been confirmed by the Sphere Association, whose handbook constitutes a framework for international best practices on minimum standards of coordinated, principled and accountable humanitarian aid delivery systems, which has categorically stated that the GHF’s approach does not align with these standards, and rather provides “indications that vulnerable populations are not effectively prioritised and that aid is being delivered in ways that expose people to extreme risk, severely compromise dignity, and fail to uphold the principle of impartiality”, Alper Küçük, “Misrepresentation of the Sphere Handbook by the Gaza Humanitarian Foundation”, *Sphere Association* (26 June 2025), <https://spherestandards.org/misrepresentation-of-the-sphere-handbook-by-the-gaza-humanitarian-foundation/>. See also, for vulnerable populations being excluded by the current approach, UN OCHA, *Humanitarian Situation Update #302 | Gaza Strip* (2 July 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-302-gaza-strip>.

¹⁰¹ Philippe Lazzarini, @UNLazzarini, Tweet (6:58 pm, 21 July 2025), <https://x.com/UNLazzarini/status/1947340417332064511>. See also Alex de Waal, “Israel’s food points are not just death traps – they’re an alibi for the starvation of Gaza — Alex de Waal”, *The Guardian* (26 July 2025), <https://www.theguardian.com/commentisfree/2025/jul/26/israel-food-starvation-gaza-famine-aid>.

¹⁰² Democracy Now!, @democracynow, Tweet (2:36 pm, 29 July 2025), <https://x.com/democracynow/status/1950173552738472152>.

3. Intensification of its policy of starvation

39. Famine has been declared in the Gaza Strip.¹⁰³ Starvation levels and the urgent need for food to survive are at the highest level they have been since the start of Israel's assault.¹⁰⁴ A recent assessment by the World Food Programme has found that food consumption had drastically deteriorated, with one in three people in Gaza going without food for days.¹⁰⁵ "Between May and July 2025, the proportion of households experiencing extreme hunger has doubled."¹⁰⁶ "Food diversity has collapsed to its worst level since the start of the conflict, triggering both acute and long-term consequences. . . . Nearly nine out of ten households resorted to extremely severe coping mechanisms to feed themselves, such as taking significant safety risks to obtain food, and scavenging from the garbage."¹⁰⁷ The famine is a catastrophe for mothers and infants.¹⁰⁸

40. Starvation functions both as an endpoint, where death occurs from starvation, and as a process of stripping people of the vital resources they need to survive, thus leading to the destruction of a people.¹⁰⁹ Israel has systematically deprived the people of Gaza of life-sustaining resources, whilst the search for food is often reduced to a death sentence as "[p]eople are being killed simply trying to feed themselves and their families",¹¹⁰ at aid distribution sites or along aid routes.¹¹¹ Families have been continuously displaced whilst shelter materials have been

¹⁰³ IPC, *IPC: Famine review committee: Gaza Strip* (August 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_Famine_Review_Committee_Report_Gaza_Aug2025.pdf.

¹⁰⁴ WFP Media, @WFP_Media, Tweet (5 :31 pm, 12 July 2025), https://x.com/WFP_Media/status/1944057008866349392; UN OCHA, *Humanitarian Situation Update #306 | Gaza Strip* (16 July 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-306-gaza-strip>.

¹⁰⁵ United Nations World Food Programme ('WFP'), *WFP delivers food inside Gaza amid restrictions and growing insecurity* (5 July 2025), <https://www.wfp.org/news/wfp-delivers-food-inside-gaza-amid-restrictions-and-growing-insecurity>.

¹⁰⁶ IPC, *IPC Alert: Worst-case scenario of Famine unfolding in the Gaza Strip* (29 July 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_GazaStrip_Alert_July2025.pdf.

¹⁰⁷ IPC, *IPC Alert: Worst-case scenario of Famine unfolding in the Gaza Strip* (29 July 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_GazaStrip_Alert_July2025.pdf.

¹⁰⁸ UN FPA, *Gaza Famine a Catastrophe for Mothers and Infants* (22 August 2025), <https://www.unfpa.org/press/gaza-famine-catastrophe-mothers-and-infants>.

¹⁰⁹ Bridget Conley and Alex de Waal, "The Purposes of Starvation: Historical and Contemporary Uses" *Journal of International Criminal Justice*, Volume 17, Issue 4, pp. 699 – 722 (September 2019), <https://academic.oup.com/jicj/article/17/4/699/5721410>, pp. 700 - 704. See generally, Alex de Waal, *Mass Starvation: The History and Future of Famine* (2017). See also Alex de Waal, "Israel's food points are not just death traps – they're an alibi for the starvation of Gaza", *The Guardian* (26 July 2025), <https://www.theguardian.com/commentisfree/2025/jul/26/israel-food-starvation-gaza-famine-aid>.

¹¹⁰ UN OCHA, *Secretary-General's press encounter on the situation in Gaza* (27 June 2025), <https://www.ochaopt.org/content/secretary-generals-press-encounter-situation-gaza>.

¹¹¹ UN OHCHR, *Palestinians in Gaza continue to be killed by starvation or by bullets from the Israeli military while trying to access food* (22 July 2025), <https://reliefweb.int/report/occupied-palestinian-territory/palestinians-gaza-continue-be-killed-starvation-or-bullets-israeli-military-while-trying-access-food-enar>.

blocked for months; life-saving supplies faced expiry on at least 6,000 UNRWA trucks as food, medicine wait at the border for the green light to enter,¹¹² and all the while Palestinians are increasingly hungry, sick and dying. Prolonged shortages in food consumption lead to severe malnutrition, which, if not addressed, “produces accelerating mortality”.¹¹³ Gaza is one of the world’s worst hunger crises, a famine unfolding in real time,¹¹⁴ where even “[a]id workers themselves are starving”, collapsing on their feet as they try to assist those around them.¹¹⁵

41. Israel has made Palestinians in Gaza completely dependent on external humanitarian aid. Key sources of food security, such as agriculture, food production infrastructure, and bakeries, have been largely destroyed or are unable to operate.¹¹⁶ Approximately 98 percent of cropland in the territory is damaged or inaccessible – decimating the agriculture sector and local food production.¹¹⁷ Even the sea and associated fishing are now prohibited to Palestinians.¹¹⁸ This, combined with severe restrictions on the entry of commercial goods, has made basic necessities either prohibitively expensive or entirely unavailable. For example, wheat flour prices in July 2025 experienced price increases fluctuating between 1400 to 5600 per cent compared to late February 2025, and there is no access to cooking oil — with most

¹¹² Philippe Lazzarini, @UNLazzarini, Tweet (11 July 2025, 6:03 pm), <https://x.com/UNLazzarini/status/1943702622059249777>.

¹¹³ Refugee International, *Untangling the Reality of Famine in Gaza* (12 September 2024), <https://www.refugeesinternational.org/reports-briefs/untangling-the-reality-of-famine-in-gaza/>, p. 7.

¹¹⁴ IPC, *IPC Alert: Worst-case scenario of Famine unfolding in the Gaza Strip* (29 July 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_GazaStrip_Alert_July2025.pdf.

¹¹⁵ UN OCHA, *Secretary-General's press encounter on the situation in Gaza* (27 June 2025), <https://www.ochaopt.org/content/secretary-generals-press-encounter-situation-gaza>; UN News, *Gaza: UN staff now fainting from hunger, exhaustion; WHO worker detained* (22 July 2025), <https://news.un.org/en/story/2025/07/1165457>. See also, on the starvation of journalists: Nicole Meir, “Joint statement on Gaza from AFP, AP, BBC, Reuters”, *AP* (24 July 2025), <https://www.ap.org/the-definitive-source/announcements/joint-statement-on-gaza-from-afp-ap-bbc-reuters/>.

¹¹⁶ United Nations Protection Cluster Occupied Palestinian Territory (‘UN PCOPT’), *Building to starvation: Systematic attacks on fishing in Gaza and implications for livelihoods and protection* (May 2025), <https://www.un.org/unispal/document/building-to-starvation-systematic-attacks-on-fishing-in-gaza-and-implications-for-livelihoods-and-protection-may-2025/>, pp.1, 2-3; World Health Organisation (‘WHO’) et al., *Joint statement by OCHA, UNDP, UNFPA, UNOPS, UNRWA, WFP and WHO on fuel shortage in Gaza* (12 July 2025), <https://www.who.int/news/item/12-07-2025-joint-statement-by-ocha--undp--unfpa--unops--unrwa--wfp-and-who-on-fuel-shortage-in-gaza>.

¹¹⁷ FAO, UNICEF, WFP and WHO, *Famine confirmed for first time in Gaza* (22 August 2025), <https://www.who.int/news/item/22-08-2025-famine-confirmed-for-first-time-in-gaza?>.

¹¹⁸ UN OCHA, *Humanitarian Situation Update #306 | Gaza Strip* (16 July 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-306-gaza-strip>; Nagham Zbeedat, “‘Are They Going to Ban the Air Next?’ | IDF Reiterates Ban on Gazans Entering the Sea, Last Remaining Source of Relief for Many Palestinians”, *Haaretz* (13 July 2025), [https://www.haaretz.com/israel-news/2025-07-13/ty-article/.premium/are-they-going-to-ban-the-air-next-idf-reiterates-ban-on-gazans-entering-the-sea/00000198-0473-dd18-a7dd-0dff4d050000](https://www.haaretz.com/israel-news/2025-07-13/ty-article/.premium/are-they-going-to-ban-the-air-next-idf-reiterates-ban-on-gazans-entering-the-sea/00000198-0473-dd18-a7dd-0dff4d050000;);

Palestinians resorting to burning garbage for cooking¹¹⁹ — nor is there adequate fuel for bakeries and community kitchens to operate.¹²⁰ Accessing cash for purchases of prohibitively expensive food has itself become prohibitively expensive, amidst an ever-worsening man-made liquidity crisis.¹²¹ High food prices, decimated livelihoods and a commercial blockade have ensured that “[f]ood aid is the only real way for people to eat.”¹²² While “[f]ood aid enough to feed one million people is positioned at aid corridors”, this aid is overwhelmingly blocked from entering.¹²³ A recent Food and Agriculture Organization of the United Nations (‘UN FAO’) study indicates that as of May 2025, the average calorific intake of Palestinians in Gaza had dropped to 67 per cent of the minimum number of calories required for survival, indicating a severe food gap that is growing by the day.¹²⁴ There thus is a direct and egregious link between Israel’s intensified blocking of the entry of such aid, its militarisation of aid distribution, and its destruction of UNRWA on the one hand and the escalation of Israel’s policy and pattern of starvation on the other. As a direct result of this deliberately inflicted scarcity of access to food, Palestinians in Gaza

¹¹⁹ IPC, *IPC Alert: Worst-case scenario of Famine unfolding in the Gaza Strip* (29 July 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_GazaStrip_Alert_July2025.pdf; WFP, *WFP delivers food inside Gaza amid restrictions and growing insecurity* (5 July 2025), <https://www.wfp.org/news/wfp-delivers-food-inside-gaza-amid-restrictions-and-growing-insecurity>.

¹²⁰ WHO et al., *Joint statement by OCHA, UNDP, UNFPA, UNOPS, UNRWA, WFP and WHO on fuel shortage in Gaza* (12 July 2025), <https://www.who.int/news/item/12-07-2025-joint-statement-by-ocha--undp--unfpa--unops--unrwa--wfp-and-who-on-fuel-shortage-in-gaza>.

¹²¹ Rosa Rahimi and Ghada Abdulfattah, “‘Cash became a commodity’: The liquidity crisis compounding suffering in Gaza”, *The New Humanitarian* (17 April 2025), <https://www.thenewhumanitarian.org/news-feature/2025/04/17/cash-became-commodity-liquidity-crisis-compounding-suffering-gaza>.

¹²² WFP, *WFP delivers food inside Gaza amid restrictions and growing insecurity* (5 July 2025), <https://www.wfp.org/news/wfp-delivers-food-inside-gaza-amid-restrictions-and-growing-insecurity>.

¹²³ *Obligations of Israel in relation to the Presence and Activities of the United Nations, Other International Organizations and Third States in and in relation to the Occupied Palestinian Territory* (‘2025 Advisory Opinion Proceedings’), *Written Replies Submitted On Behalf Of The Secretary-General Of The United Nations To The Questions Put By Vice-President Sebutinde And Judge Gómez Robledo at the end of the hearing held on 2 May 2025* (7 May 2025), <https://www.icj-cij.org/sites/default/files/case-related/196/196-20250507-oth-14-00-en.pdf>, p. 5, para. 1; only meagre amounts of aid have been let in during Israel’s one-week ‘loosening’ of its blockade, see e.g. UN OCHA, *Statement on Gaza by Tom Fletcher, Under-Secretary-General for Humanitarian Affairs and Emergency Relief Coordinator* (27 July 2025), <https://www.ochaopt.org/content/statement-gaza-tom-fletcher-under-secretary-general-humanitarian-affairs-and-emergency-relief-coordinator-2>; on the ineffectiveness of airdrops, see Philippe Lazzarini, @UNLazzarini, Tweet (12:14 pm, 1 August 2025), <https://x.com/UNLazzarini/status/1951225049869947145>.

¹²⁴ Food and Agriculture Organization of the United Nations (‘UN FAO’), *Briefing note on the Occupied Palestinian Territory: Food pipeline disruption and declining food availability in the Gaza Strip: Implications under international humanitarian and human rights law* (15 May 2025), <https://reliefweb.int/report/occupied-palestinian-territory/briefing-note-occupied-palestinian-territory-food-pipeline-disruption-and-declining-food-availability-gaza-strip-implications-under-international-humanitarian-and-human-rights-law>.

are experiencing not only famine,¹²⁵ but a breakdown of social bonds,¹²⁶ another clear indicator of mass starvation and famine in a population according to experts.¹²⁷

4. Indicators of starvation: malnutrition

42. After its famine alert of 29 July 2025 calling for immediate action,¹²⁸ on 22 August 2025 the IPC confirmed that the famine threshold for malnutrition has been met in the Gaza Governate and will be reached in Deir al-Balah and Khan Younis Governates in the coming weeks.¹²⁹ Israel's intensified starvation campaign has caused especially severe harm to young children, pregnant and breastfeeding women. 92 per cent of children aged 6 to 23 months and pregnant and breastfeeding women have not met their nutrient requirement since February 2025.¹³⁰ Recent Nutrition Cluster reports indicate a sharp rise in acute malnutrition rates across all governorates between May and mid-June 2025 for children and in cases of severe acute watery diarrhoea which contributes to secondary malnutrition:¹³¹ "starvation rates among children hit their highest levels in June, with over 5,800 girls and boys diagnosed as acutely malnourished."¹³² Between May and July 2025, acute malnutrition rates doubled in Khan Younis, increased by 70 percent in Deir al-Balah, and by 275 percent in Gaza City. Over half the children in the area of the

¹²⁵ IPC, *IPC: Famine review committee: Gaza Strip* (August 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_Famine_Review_Committee_Report_Gaza_Aug2025.pdf.

¹²⁶ See, e.g., UN News, *Desperate hunger drives crowd to storm UN food warehouse in Gaza* (29 May 2025), <https://news.un.org/en/story/2025/05/1163831>; UN OHCHR, *Palestinians in Gaza continue to be killed in hundreds against a looming threat of forcible transfer outside Gaza* (11 July 2025), <https://reliefweb.int/report/occupied-palestinian-territory/palestinians-gaza-continue-be-killed-hundreds-against-looming-threat-forcible-transfer-outside-gaza>; Alex de Waal, "Israel's food points are not just death traps – they're an alibi for the starvation of Gaza", *The Guardian* (26 July 2025), <https://www.theguardian.com/commentisfree/2025/jul/26/israel-food-starvation-gaza-famine-aid>.

¹²⁷ Tom Dannenbaum, "Siege Starvation: A War Crime of Societal Torture", *Chicago Journal of International Law*, Volume 22(2), pp. 368 - 442 (7 July 2021), <https://chicagounbound.uchicago.edu/cgi/viewcontent.cgi?article=1814&context=cjil>, p. 429.

¹²⁸ IPC, *IPC Alert: Worst-case scenario of Famine unfolding in the Gaza Strip* (29 July 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_GazaStrip_Alert_July2025.pdf.

¹²⁹ IPC, *IPC: Famine review committee: Gaza Strip* (August 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_Famine_Review_Committee_Report_Gaza_Aug2025.pdf.

¹³⁰ UN OCHA, *Reported impact snapshot | Gaza Strip* (9 July 2025), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-9-july-2025>. IPC, *IPC: Famine review committee: Gaza Strip* (August 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_Famine_Review_Committee_Report_Gaza_Aug2025.pdf.

¹³¹ UN OCHA, *Humanitarian Situation Update #302 | Gaza Strip* (2 July 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-302-gaza-strip>.

¹³² UN OCHA, *Security Council briefing by Tom Fletcher, Under-Secretary-General for Humanitarian Affairs, on the Middle East* (16 July 2025), <https://www.ochaopt.org/content/security-council-briefing-tom-fletcher-under-secretary-general-humanitarian-affairs-middle-east>. See also Médecins sans Frontières ('MSF'), *MSF: 1 in 4 young children and pregnant women in its clinics in Gaza are malnourished* (24 July 2025), <https://www.doctorswithoutborders.org/latest/msf-1-4-young-children-and-pregnant-women-its-clinics-gaza-are-malnourished>.

Gaza Governate are now acutely malnourished.¹³³ Between April and mid-July, more than 20,000 children were admitted for treatment for acute malnutrition in Gaza, with more than 3,000 severely malnourished.¹³⁴ Micronutrient deficiencies are “likely rising rapidly alongside acute malnutrition, with dire impacts on children’s health, development, and risk of mortality.”¹³⁵ Experts project an aggravation in this situation due to scarcity of nutrition supplies, including supplements and ready-to-use complementary food.¹³⁶ Death is imminent for probably thousands of children.¹³⁷

43. The recent critical and man-made shortage of formula and breast milk substitutes is projected to also contribute to malnutrition and the death of infants.¹³⁸ Formula and breast milk substitutes have become particularly important as pregnant and breastfeeding women are suffering from malnutrition, or where they have been killed.¹³⁹ As is water – UN experts have decried the disproportionate effect of cutting off food and water on children and babies, labelling “thirst as a weapon”.¹⁴⁰ Amidst the rising rates of malnutrition and predicted indicators of starvation, medical and health care systems remain shattered, reducing the possibilities of those

¹³³ IPC, *IPC: Famine review committee: Gaza Strip* (August 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_Famine_Review_Committee_Report_Gaza_Aug2025.pdf.

¹³⁴ IPC, *IPC Alert: Worst-case scenario of Famine unfolding in the Gaza Strip* (29 July 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_GazaStrip_Alert_July2025.pdf.

¹³⁵ IPC, *IPC Alert: Worst-case scenario of Famine unfolding in the Gaza Strip* (29 July 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_GazaStrip_Alert_July2025.pdf.

¹³⁶ UN OCHA, *Humanitarian Situation Update #302 | Gaza Strip* (2 July 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-302-gaza-strip>.

¹³⁷ Akbar Shahid Ahmed, “Past The Point Of No Return’: Doctor Gives On-The-Ground Insight Into Starvation In Gaza”, *Huffington Post* (28 July 2025), https://www.huffingtonpost.co.uk/entry/gaza-starvation-doctor-israel-palestinians_n_6886aff0e4b04be5e46823d6.

¹³⁸ UN OCHA, *Humanitarian Situation Update #302 | Gaza Strip* (2 July 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-302-gaza-strip>; William Christou and Malak A Tantesh, “‘They’re skin and bones’: doctors in Gaza warn babies at risk of death from lack of formula”, *The Guardian* (5 July 2025), <https://www.theguardian.com/world/2025/jul/05/theyre-skin-and-bones-doctors-in-gaza-warn-babies-at-risk-of-death-from-lack-of-formula>; Nick Maynars, “I’m witnessing the deliberate starvation of Gaza’s children – why is the world letting it happen?”, *The Guardian* (22 July 2025), https://www.theguardian.com/commentisfree/2025/jul/22/gaza-israel-deliberate-starvation-ceasefire-aid?CMP=share_btn_url.

¹³⁹ William Christou and Malak A Tantesh, “‘They’re skin and bones’: doctors in Gaza warn babies at risk of death from lack of formula”, *The Guardian* (5 July 2025), <https://www.theguardian.com/world/2025/jul/05/theyre-skin-and-bones-doctors-in-gaza-warn-babies-at-risk-of-death-from-lack-of-formula>.

¹⁴⁰ UNHRC, “*Thirst as a weapon*”: UN experts condemn Israel’s deliberate dehydration and starvation of the Palestinian people (29 July 2025) <https://www.ohchr.org/en/press-releases/2025/07/thirst-weapon-un-experts-condemn-israels-deliberate-dehydration-and?sub-site=HRC>.

children affected making a full recovery,¹⁴¹ and increasing the risk of refeeding syndrome.¹⁴² The United Nations Children's Fund ('UNICEF') estimates that on average, 112 children have been admitted for treatment for malnutrition in the Gaza Strip every single day in the first five months of the year.¹⁴³ If the situation continues, it is estimated that 71,000 children under the age of five will be acutely malnourished in the next 11 months.

44. In Gaza, the rate of malnutrition is surging.¹⁴⁴ Its long-term and intergenerational impact is devastating. For those who survive, malnutrition can result in stunted growth,¹⁴⁵ impaired cognitive development and poor health — consequences that can impact an “entire generation”.¹⁴⁶

5. *Indicators of starvation: disease*

45. Another indicator of starvation in a population is the prevalence of disease. Malnutrition weakens the body and hampers its ability to fight off everyday illnesses and communicable diseases such as diarrhoea or pneumonia; it also makes recovery more difficult.¹⁴⁷ As the World Health Organization explains, infections increase the body's requirement for nutrition, while reducing nutrient intake and absorption, resulting in worsening malnutrition. Thus, people in Gaza are trapped in a “dangerous cycle” where malnutrition and disease fuel each other, turning common illnesses into a potential “death sentence”, especially for children.¹⁴⁸ In addition, Israel has attacked essential water, sanitation, and health systems in Gaza, crippling the capacity to treat severe malnutrition, whilst its blockade on fuel threatens to

¹⁴¹ UN News, *More Gazans killed trying to get food, healthcare near to 'full disaster'* (17 June 2025), <https://news.un.org/en/story/2025/06/1164471>; UN OCHA, *Reported impact snapshot | Gaza Strip* (9 July 2025), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-9-july-2025>. See also Physicians for Human Rights ('PHR'), *"We Could Have Saved So Many More": Anguish and Death Caused by Israel's Restrictions on Medical Supplies in Gaza* (9 July 2025), <https://phr.org/our-work/resources/we-could-have-saved-so-many-more-anguish-and-death-caused-by-israels-restrictions-on-medical-supplies-in-gaza/>.

¹⁴² Anera, *When Famine Becomes Irreversible in Gaza* (29 July 2025), <https://www.anera.org/blog/when-famine-becomes-irreversible-in-gaza/>.

¹⁴³ The United Nations Children's Fund ('UNICEF'), *More than 5000 children diagnosed with malnutrition in the Gaza Strip in May* (19 June 2025), <https://www.unicef.org/press-releases/more-5000-children-diagnosed-malnutrition-gaza-strip-may>.

¹⁴⁴ UN News, *Gazans dying in search of food, 'starkest illustration' of their desperation* (11 July 2025), <https://news.un.org/en/story/2025/07/1165379>.

¹⁴⁵ William Christou and Malak A Tantesh, “‘They’re skin and bones’: doctors in Gaza warn babies at risk of death from lack of formula”, *The Guardian* (5 July 2025), <https://www.theguardian.com/world/2025/jul/05/theyre-skin-and-bones-doctors-in-gaza-warn-babies-at-risk-of-death-from-lack-of-formula>.

¹⁴⁶ WHO, *People in Gaza starving, sick and dying as aid blockade continues* (12 May 2025), <https://www.who.int/news/item/12-05-2025-people-in-gaza-starving--sick-and-dying-as-aid-blockade-continues>.

¹⁴⁷ WHO, *People in Gaza starving, sick and dying as aid blockade continues* (12 May 2025), <https://www.who.int/news/item/12-05-2025-people-in-gaza-starving--sick-and-dying-as-aid-blockade-continues>.

¹⁴⁸ World Health Organization, *People in Gaza starving, sick and dying as aid blockade continues* (News release, 12 May 2025).

eliminate whatever remaining health and water services remain¹⁴⁹ as “hospitals are already going dark, [and] maternity, neonatal and intensive care units are failing”.¹⁵⁰ The direct consequence for health services will be to cease treating children with malnutrition or using unsafe water.¹⁵¹ The combination of a lack of food, clean water and health care services spurs on disease outbreaks that “push Gaza’s most vulnerable even closer to death”.¹⁵²

6. Indicators of starvation: increasing death and famine

46. The IPC has affirmed that “[m]ounting evidence shows that widespread starvation, malnutrition, and disease are driving a rise in hunger-related deaths.”¹⁵³ The World Health Organization reports that since the aid blockade was reimposed on 2 March 2025, at least 57 children have died from the effects of malnutrition and that this number is “likely an underestimate and is likely to increase.”¹⁵⁴ Since the start of Israel’s offensive on Gaza, 269 deaths from malnutrition, including 112 children, have been documented — with 204 of those deaths, of whom 51 were children, since 1 July 2025.¹⁵⁵ Those deaths include that of a seven month old infant, named Salam, who recently died in a clinic from severe malnutrition as her bones and skull were poking out of her skin;¹⁵⁶ and that of 5-month old Zainab, who

¹⁴⁹ UNICEF, *More than 5000 children diagnosed with malnutrition in the Gaza Strip in May* (19 June 2025), <https://www.unicef.org/press-releases/more-5000-children-diagnosed-malnutrition-gaza-strip-may>. See also e.g. Oxfam,

Israel using water as weapon of war as Gaza supply plummets by 94%, creating deadly health catastrophe: Oxfam (17 July 2025), <https://www.oxfam.org/en/press-releases/israel-using-water-weapon-war-gaza-supply-plummets-94-creating-deadly-health>.

¹⁵⁰ WHO et al, *Joint statement by OCHA, UNDP, UNFPA, UNOPS, UNRWA, WFP and WHO on fuel shortage in Gaza* (12 July 2025), <https://www.who.int/news/item/12-07-2025-joint-statement-by-ocha--undp--unfpa--unops--unrwa--wfp-and-who-on-fuel-shortage-in-gaza>.

¹⁵¹ UNICEF, *More than 5000 children diagnosed with malnutrition in the Gaza Strip in May* (19 June 2025), <https://www.unicef.org/press-releases/more-5000-children-diagnosed-malnutrition-gaza-strip-may>.

¹⁵² WHO et al, *Joint statement by OCHA, UNDP, UNFPA, UNOPS, UNRWA, WFP and WHO on fuel shortage in Gaza* (12 July 2025), <https://www.who.int/news/item/12-07-2025-joint-statement-by-ocha--undp--unfpa--unops--unrwa--wfp-and-who-on-fuel-shortage-in-gaza>.

¹⁵³ IPC, *IPC Alert: Worst-case scenario of Famine unfolding in the Gaza Strip* (29 July 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_GazaStrip_Alert_July2025.pdf.

¹⁵⁴ WHO, *People in Gaza starving, sick and dying as aid blockage continues* (12 May 2025), <https://www.who.int/news/item/12-05-2025-people-in-gaza-starving--sick-and-dying-as-aid-blockage-continues>.

¹⁵⁵ UN OCHA, *Humanitarian Situation Update #315 | Gaza Strip* (21 August 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-315-gaza-strip>. See also e.g. DCI Palestine, “*Starving a Generation*” report indicts Israel for weaponizing starvation as a tool of genocide (24 June 2025), https://www.dci-palestine.org/starving_a_generation_report_indicts_israel_for_weaponizing_starvation_as_a_tool_of_genocide.

¹⁵⁶ Nir Hasson, “Aid Groups: Infants are dying in Gaza because Israel impede import of baby formula”, *Haaretz* (11 July 2025), <https://www.haaretz.com/israel-news/2025-07-11/ty-article/.premium/aid-groups-infants-are-dying-in-gaza-because-israel-impedes-import-of-baby-formula/00000197-f690-dd18-a7df-ffbfee450000>.

weighed less when she died than when she was born.¹⁵⁷ Death and famine are also indicators of starvation, but ones that come too late.

47. Famine-level mortality is usually confirmed retroactively and only once certain very high thresholds have been met regarding the severity and magnitude of the situation.¹⁵⁸ By the time such a threshold is declared as met, it is often too late for majority of the affected population who have either been killed or will experience life-long and irreversible effects of starvation.¹⁵⁹ Already in May 2025, the IPC determined that nearly half a million people in Gaza were facing catastrophic hunger, and the entire population was experiencing acute food insecurity.¹⁶⁰ These numbers, according to experts, were extraordinary and an outlier in comparison to other famine situations.¹⁶¹ The IPC's 29 July 2025 alert of the "worst-case scenario of famine . . . unfolding in the Gaza Strip"¹⁶² was a "devastating but entirely predictable confirmation of what . . . the wider humanitarian community have long warned: Israel's restrictions on aid have created the conditions for famine, and the window to prevent mass death is rapidly closing."¹⁶³ This prediction was confirmed in the IPC Famine Review Committee Report of 22 August 2025, which recorded that the famine thresholds have been reached, and that there is evidence of rapidly worsening underlying factors of acute malnutrition within the Gaza Strip.¹⁶⁴ It is likely that actual deaths due to malnutrition significantly exceed reported deaths by the Ministry of Health.¹⁶⁵ According to the co-founder of the non-governmental humanitarian aid organisation MedGlobal, a paediatrician who volunteered twice in Gaza during the war: "It

¹⁵⁷ Samy Magdy and Marriam Dagga, "The latest child to starve to death in Gaza weighed less than when she was born" (27 July 2025), <https://apnews.com/article/gaza-israel-starvation-children-malnutrition-baby-baf865b861c9a2fd9c75068936062146>.

¹⁵⁸ Alex de Waal, "How to Measure Famine, Alex de Waal on the classification of catastrophe in Gaza" *London Review of Books*, Volume 47, No. 2 (6 February 2025), <https://www.lrb.co.uk/the-paper/v47/n02/alex-de-waal/how-to-measure-famine>, p. 5.

¹⁵⁹ Action Against Hunger, *Latest data on Gaza confirms worst-case scenario: Famine unfolds with over 20,000 children hospitalized for acute malnutrition* (29 July 2025), <https://reliefweb.int/report/occupied-palestinian-territory/latest-data-gaza-confirms-worst-case-scenario-famine-unfolds-over-20000-children-hospitalized-acute-malnutrition>.

¹⁶⁰ WFP, *Risk of famine across all of Gaza, new report says* (12 May 2025), <https://www.wfp.org/news/risk-famine-across-all-gaza-new-report-says>.

¹⁶¹ Alex de Waal, "How to Measure Famine, Alex de Waal on the classification of catastrophe in Gaza" *London Review of Books*, Volume 47, No. 2 (6 February 2025), <https://www.lrb.co.uk/the-paper/v47/n02/alex-de-waal/how-to-measure-famine>, p. 6.

¹⁶² IPC, *IPC Alert: Worst-case scenario of Famine unfolding in the Gaza Strip* (29 July 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_GazaStrip_Alert_July2025.pdf.

¹⁶³ International Rescue Committee, *The IRC reacts to the IPC alert confirming famine conditions in Gaza* (29 July 2025) <https://www.rescue.org/uk/press-release/irc-reacts-ipc-alert-confirming-famine-conditions-gaza>.

¹⁶⁴ IPC, *IPC: Famine review committee: Gaza Strip* (August 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_Famine_Review_Committee_Report_Gaza_Aug2025.pdf.

¹⁶⁵ IPC, *IPC: Famine review committee: Gaza Strip* (August 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_Famine_Review_Committee_Report_Gaza_Aug2025.pdf.

appears that we have crossed the line where a segment of the population has reached their limits . . . This is the beginning of a population death spiral”.¹⁶⁶

IV. THE ‘GAZA HUMANITARIAN FOUNDATION’

48. On 26 May 2025, the United States of America (‘US’) and Israel-backed GHF began operating in Gaza, supposedly as a limited means of aid distribution following months of total blockade. The Financial Times has reported that the consulting firm Boston Consulting Group assisted in establishing the GHF, and its related plan of relocation of Palestinians.¹⁶⁷ Far from easing Israel’s deliberate starvation campaign, the contractor — operating only from four South Gaza sites, where it fields armed US security personnel alongside the Israeli army in a deliberately “militarized” arrangement¹⁶⁸ — actually advances Israel’s genocide under the cover of humanitarian aid, helping it escape scrutiny. It has been labelled “weaponised hunger”¹⁶⁹ and “engineered scarcity”, with its organisers “[k]nowingly designing a plan that falls short of minimum obligations under international law”,¹⁷⁰ constituting a “militarized system [that] endangers lives and violates international standards”.¹⁷¹ De Waal explains how the GHF’s ration stations are “at best an improvisation by amateurs and at worst a cover for the crime of ongoing mass starvation.”¹⁷²

¹⁶⁶ Wafaa Shurafa, Sarah El Deeb, and Lee Keath, “Dozens of kids and adults in Gaza have starved to death in July as hunger surges”, *AP News* (25 July 2025), <https://apnews.com/article/gaza-palestinians-starvation-famine-israel-children-3a7403d4f6ec483a03d6cbb0c45fd06a>.

¹⁶⁷ The Group has since disavowed any association with it, claiming that seniors in the firm were misled as to the true scope and nature of the work: Stephen Foley, “BCG modelled plan to ‘relocate’ Palestinians from Gaza”, *Financial Times* (5 July 2025), <https://www.ft.com/content/c0e661cc-55db-4e2a-b17b-a656e0cf6c14>.

¹⁶⁸ UN OHCHR, *OPT: Attacks around aid distribution site in Gaza* (3 June 2025), <https://www.ohchr.org/en/press-releases/2025/06/opt-attacks-around-aid-distribution-site-gaza>. UN OCHA, *600 days of horror in Gaza: A call to end engineered scarcity and collective punishment - OCHA* (28 May 2025), <https://www.un.org/unispal/document/600-days-of-horror-in-gaza-a-call-to-end-engineered-scarcity-and-collective-punishment-ocha/> (emphasis added); UN OHCHR, *Desperate Palestinians seeking food killed in Gaza* (18 June 2025), <https://reliefweb.int/report/occupied-palestinian-territory/desperate-palestinians-seeking-food-killed-gaza>.

¹⁶⁹ UN OCHA, *Briefing by Jonathan Whittall, Head of OCHA OPT, to journalists in Deir al Balah, Gaza Strip* (23 June 2025), <https://reliefweb.int/report/occupied-palestinian-territory/briefing-jonathan-whittall-head-ocha-opt-journalists-deir-al-balah-gaza-strip-enarhe>.

¹⁷⁰ UN OCHA, *600 days of horror in Gaza: A call to end engineered scarcity and collective punishment - OCHA* (28 May 2025), <https://www.un.org/unispal/document/600-days-of-horror-in-gaza-a-call-to-end-engineered-scarcity-and-collective-punishment-ocha/> (emphasis added).

¹⁷¹ UN OHCHR, *OPT: Attacks around aid distribution site in Gaza* (3 June 2025), <https://www.ohchr.org/en/press-releases/2025/06/opt-attacks-around-aid-distribution-site-gaza> (emphasis added).

¹⁷² Alex de Waal, “Israel’s food points are not just death traps – they’re an alibi for the starvation of Gaza — Alex de Waal”, *The Guardian* (26 July 2025), <https://www.theguardian.com/commentisfree/2025/jul/26/israel-food-starvation-gaza-famine-aid>.

49. GHF was not intended to prevent starvation in Gaza. The contractor was introduced following the Prime Minister of Israel's announcement on 19 May 2025 that "*minimal*" aid would be allowed into Gaza because of concern regarding "*images of mass starvation*" which threatened Israel's ability to continue its operation: "*Without international backing, we won't be able to complete the mission of victory*".¹⁷³ Accordingly, it acts to "*aid wash[. . .]*"¹⁷⁴ Israel's actions in Gaza, to prevent only the "*images*" of famine so as to continue international support.

50. Indeed, the contractor was introduced to deliberately side-step the already extant network of United Nations aid operations which have been prevented from operating by Israel. This network, involving 400 sites¹⁷⁵ for distribution, with experienced personnel, has repeatedly indicated it was ready to operate — if allowed:¹⁷⁶ trucks are ready outside, but denied entry.¹⁷⁷ The GHF deliberately bypasses this network, highlighting that the aim of the foundation was not in fact to ensure aid. As the Under-Secretary-General for Humanitarian Affairs and Emergency Relief Coordinator has said "the Israeli-designed distribution modality is not the answer" because it "practically excludes many, including people with disabilities, women, children, the elderly, the wounded" and it "forces further displacement" and "exposes thousands of people to harm".¹⁷⁸ 244 NGOs have called for its immediate end, stating that the militarised scheme "violate[d] international law, d[id] not adhere to humanitarian principles, deepen harm, and risk[ed] complicity in atrocities."¹⁷⁹

51. The system is not designed to functionally provide aid. It is run by US military contractors without a background in aid, such that it does not and cannot meet the population's needs. It shuts down for days,¹⁸⁰ and its limited locations (four

¹⁷³ Noa Shpigel, "We're Destroying Gaza': Netanyahu, Smotrich Rush to Soothe Right's Fears Over Aid Renewal", *Haaretz* (19 May 2025), <https://www.haaretz.com/israel-news/2025-05-19/ty-article/.premium/were-destroying-gaza-netanyahu-smotrich-rush-to-soothe-fears-over-aid-renewal/00000196-e7b4-d93f-a3b6-fff77c780000> (emphasis added).

¹⁷⁴ Al Jazeera, "US-Israel scheme dispenses Gaza aid as UN says 180,000 displaced in 10 days", *Al Jazeera* (27 May 2025), <https://www.aljazeera.com/news/2025/5/27/us-backed-group-distributes-aid-in-gaza-amid-worsening-displacement> (emphasis added).

¹⁷⁵ The Guardian, "'These are traps set for the people': the story of a mother shot dead searching for food in Gaza", *The Guardian* (7 June 2025), <https://www.theguardian.com/news/ng-interactive/2025/jun/07/story-of-a-mother-shot-dead-searching-for-food-in-gaza>.

¹⁷⁶ UN OCHA, *UN Relief Chief demands rapid, safe, unimpeded aid delivery in Gaza* (16 May 2025), <https://www.ochaopt.org/content/un-relief-chief-demands-rapid-safe-unimpeded-aid-delivery-gaza>.

¹⁷⁷ UN OCHA, *Gaza Humanitarian Response Update | 8-21 June 2025* (24 June 2025), <https://www.ochaopt.org/content/gaza-humanitarian-response-update-8-21-june-2025>.

¹⁷⁸ UN Palestine, *Briefing to the Security Council on the humanitarian situation and the protection of aid workers in Gaza by Tom Fletcher, Under-Secretary-General for Humanitarian Affairs and Emergency Relief Coordinator* (13 May 2025), <https://www.un.org/unispal/document/un-relief-chief-briefing-13may25/>.

¹⁷⁹ Oxfam International et al., "GAZA: Starvation or gunfire — not a humanitarian response", *Oxfam International* (30 June 2025), <https://www.oxfam.org/en/press-releases/gaza-starvation-or-gunfire-not-humanitarian-response>.

¹⁸⁰ Al Jazeera, "Israeli strikes kill more than 50 Palestinians across Gaza", *Al Jazeera* (5 June 2025), <https://www.aljazeera.com/news/2025/6/5/us-backed-ghf-group-extends-closure-of-gaza-aid-sites-for-second-day>.

places, rather than the United Nation's 400), means that the elderly, disabled, children — and indeed the hundreds of thousands of Palestinians malnourished and weak — cannot reach aid, lacking the strength to travel to the locations. Palestinians who reach the spots are faced with miniscule amounts of aid,¹⁸¹ such that they continue to experience famine and starvation (set out above).¹⁸² Even the minimal food provided often requires cooking, requiring water or fuel — almost non-existent in Gaza¹⁸³ — such that it cannot be used.¹⁸⁴

52. The genocidal intentions of Israel are now aided and abetted by the GHF's aid efforts, which have served as a mechanism to force starving Palestinians into a militarised zone, crowding them in cages topped with barbed wire and dehumanising them further,¹⁸⁵ before killing and injuring them while they line up for food. This occurred immediately after they were opened: on 27 May 2025, three Palestinians were killed and dozens injured.¹⁸⁶ These intentions are also clear with respect to other aid routes or mechanisms. On 16 June 2025, the Israeli military shelled a crowd of Palestinians waiting for UN food trucks, killing at least 51 Palestinians and injuring 200.¹⁸⁷ On 10 July 2025, 15 Palestinians, including nine children and four women, waiting in line for nutritional supplies, were killed.¹⁸⁸ On 24 July 2025, the GHF organised a women-only aid pick-up day, at which women

¹⁸¹ MSF, "Gaza Humanitarian Foundation aid distribution system must be dismantled", *MSF* (27 June 2025), <https://reliefweb.int/report/occupied-palestinian-territory/gaza-humanitarian-foundation-aid-distribution-system-must-be-dismantled>.

¹⁸² Amnesty International, "Gaza: Israel turns seeking aid into a deadly trap for starving Palestinians - further evidence of genocide", *Amnesty International* (3 July 2025), <https://www.amnesty.org.uk/press-releases/gaza-israel-turns-seeking-aid-deadly-trap-starving-palestinians-further-evidence>.

¹⁸³ See UN OCHA, *Statement attributable to the Spokesperson for the Secretary-General - on the humanitarian crisis in Gaza* (3 July 2025), <https://www.ochaopt.org/content/statement-attributable-spokesperson-secretary-general-humanitarian-crisis-gaza>.

¹⁸⁴ Oxfam International et al., "GAZA: Starvation or gunfire — not a humanitarian response", *Oxfam International* (30 June 2025), <https://www.oxfam.org/en/press-releases/gaza-starvation-or-gunfire-not-humanitarian-response>; Michelle Nichols and Emma Fargem, "What is the new US-backed Gaza aid plan and why doesn't the UN like it?", *Reuters* (10 June 2025), <https://www.reuters.com/world/middle-east/new-us-backed-gaza-aid-plan-why-un-doesnt-like-it-2025-05-20/>. See also Alex de Waal, "Israel's food points are not just death traps — they're an alibi for the starvation of Gaza — Alex de Waal", *The Guardian* (26 July 2025), <https://www.theguardian.com/commentisfree/2025/jul/26/israel-food-starvation-gaza-famine-aid>. Kevin Nguyen and Alex Murray, "What is inside the GHF food aid box being distributed in Gaza?" *BBC* (24 July 2025), <https://www.bbc.com/news/articles/cd787er1qz4o>.

¹⁸⁵ Henry Bodkin and Ruwaida Amer, "The US aid agency sowing chaos in Gaza", *The Telegraph* (3 June 2025), <https://www.telegraph.co.uk/world-news/2025/06/03/us-aid-agency-that-pens-starving-gazans-in-terrifying-cages/>.

¹⁸⁶ "3 Palestinians killed and dozens wounded near Rafah aid distribution site: medics", *CBC* (2 June 2025), <https://www.cbc.ca/news/world/gaza-israel-aid-site-1.7549697>.

¹⁸⁷ UN OHCHR, *Desperate Palestinians seeking food killed in Gaza* (18 June 2025), <https://reliefweb.int/report/occupied-palestinian-territory/desperate-palestinians-seeking-food-killed-gaza>.

¹⁸⁸ UNICEF, *Statement by UNICEF Executive Director Catherine Russell on children killed during a nutrition aid distribution in the Gaza Strip* (10 July 2025), <https://www.unicef.org/press-releases/statement-unicef-executive-director-catherine-russell-children-killed-during>.

were beaten and two women were killed.¹⁸⁹ In many of these instances, Israeli army officers have confirmed that the use of live fire was intentional.¹⁹⁰ Amnesty International has labelled the aid points a “booby trap”.¹⁹¹ Testimony indicates that “soldiers film people fighting over the aid, and once it’s finished, they throw teargas to disperse the crowd”.¹⁹² A former U.S. Lt. Col. and special forces veteran who served at the GHF site stated: “in my most frank assessment I would say that they’re criminal. In my entire career have I never witnessed the level of brutality, and use of indiscriminate and unnecessary force against a civilian population, an unarmed, starving population. I’ve never witnessed that in all the places I’ve been deployed to war until I was in Gaza at the hands of the IDF and U.S. contractors . . . without question I witnessed war crimes being held . . . by the Israeli forces without a doubt, using artillery rounds, mortar rounds, firing tank rounds into unarmed civilians, is a war crime.”¹⁹³ As the head of Refugees International and former lead of the United States Agency for International Development (‘USAID’) stated, “[i]f the GHF were a genuine humanitarian effort they would have long since halted a distribution model that produces daily massacres”.¹⁹⁴

53. Further, the system intends to facilitate other war crimes, including forcible transfer and starvation. As above, there are only four aid distribution points, all in the south of Gaza. For persons to potentially access any aid, they must travel to these locations, forcing those of the two million displaced persons in Gaza strong enough to travel into these militarised zones,¹⁹⁵ all while Israel’s policy of starvation continues, particularly in the North. In forcing Palestinians into these zones that are managed by US military contractors and the Israeli army, the GHF allows it to fulfil

¹⁸⁹ Tareq S. Hajjaj, “Palestinian women were told to go to U.S.-run aid sites in Gaza. They were killed and beaten instead, eyewitnesses say”, *Mondoweiss* (24 July 2025), <https://mondoweiss.net/2025/07/palestinian-women-were-told-to-go-to-u-s-run-aid-sites-in-gaza-they-were-killed-and-beaten-instead-eyewitnesses-say/>.

¹⁹⁰ Sheren Falah Saab, Jack Khoury, Nagham Zbeedat, Nir Hasson and Liza Rozovsky, “Testimonies: IDF Responsible for Lethal Shootings Near U.S.-led Aid Site in Gaza”, *Haaretz* (5 June 2025), <https://www.haaretz.com/middle-east-news/palestinians/2025-06-05/ty-article-magazine/premium/testimonies-idf-responsible-for-lethal-shootings-near-rafah-u-s-led-aid-site/00000197-3ff2-da41-a9f7-3ff623280000>.

¹⁹¹ Amnesty International, “Gaza: Israel turns seeking aid into a deadly trap for starving Palestinians - further evidence of genocide”, *Amnesty International* (3 July 2025), <https://www.amnesty.org.uk/press-releases/gaza-israel-turns-seeking-aid-deadly-trap-starving-palestinians-further-evidence>.

¹⁹² The Guardian, “‘These are traps set for the people’: the story of a mother shot dead searching for food in Gaza”, *The Guardian* (7 June 2025), <https://www.theguardian.com/news/ng-interactive/2025/jun/07/story-of-a-mother-shot-dead-searching-for-food-in-gaza>.

¹⁹³ “Former US Green Beret says Israel committed war crimes at Gaza food distribution site | BBC News”, *BBC* (26 July 2025), <https://www.youtube.com/watch?v=72aZhsNMOWk> [5:15-6:10].

¹⁹⁴ Jeremy Konyndyk, @JeremyKonyndyk, Tweet (14 June 2025, 5:59 pm), <https://x.com/JeremyKonyndyk/status/1933917123593781580>.

¹⁹⁵ Amnesty International, “Gaza: Starvation or gunfire — this is not a humanitarian response”, *Amnesty International* (1 July 2025), <https://www.amnesty.org/en/latest/news/2025/07/gaza-starvation-or-gunfire-this-is-not-a-humanitarian-response/>.

the goal of “creat[ing] a zone under IDF control”,¹⁹⁶ furthering Israel’s illegal occupation of and control in Gaza. As UNWRA made clear, “[t]his humiliating system has forced thousands of hungry and desperate people to walk for tens of miles to an area that’s all but pulverized due to heavy bombardment by the Israeli Army”, stating “aid distribution has become a death trap”.¹⁹⁷

54. This was all by design.¹⁹⁸ The plan was originally conceptualised by Israeli officials, as a means of controlling of Gaza’s population,¹⁹⁹ and as the first step to what is now labelled the creation of “concentration camps”²⁰⁰ for Palestinians in Gaza.²⁰¹ Despite initially denying that the foundation was a part of Israel’s plan to forcibly displace Palestinians,²⁰² the head of GFH, Jake Wood, announced his resignation on 25 May 2025, on the basis that it was “*clear that it is not possible to implement this plan while also strictly adhering to the humanitarian principles of humanity, neutrality, impartiality, and independence, which I will not abandon*”.²⁰³ It has been revealed that USAID officials, prior to its launch, warned it should not proceed given “*operational and reputational risks and lack of oversight*”, lacking “*sufficient information to ensure that aid will reach intended recipients*” and contradicting the “*do no harm*” principle core to humanitarian aid.²⁰⁴ It is intended to do more harm, through for instance its plans to distribute formula for starving

¹⁹⁶ Noa Shpigel, “We’re Destroying Gaza: Netanyahu, Smotrich Rush to Soothe Right’s Fears Over Aid Renewal”, *Haaretz* (19 May 2025), <https://www.haaretz.com/israel-news/2025-05-19/ty-article/.premium/were-destroying-gaza-netanyahu-smotrich-rush-to-soothe-fears-over-aid-renewal/00000196-e7b4-d93f-a3b6-fff77c780000> (emphasis added).

¹⁹⁷ UNRWA, *UNRWA Commissioner-General on Gaza: Aid distribution has become a death trap* (1 June 2025), <https://www.unrwa.org/newsroom/official-statements/unrwa-commissioner-general-gaza-aid-distribution-has-become-death-trap>.

¹⁹⁸ See also Democracy Now!, @democracynow, Tweet (2:36 pm, 29 July 2025), <https://x.com/democracynow/status/1950173552738472152>; Senator Chris Van Hollen, @ChrisVanHollen, Tweet (5:02 pm, 29 July 2025), <https://x.com/ChrisVanHollen/status/1950210274813681964> [19:35-24:30].

¹⁹⁹ Patrick Kingsley, Ronen Bergman and Natan Odenheimer, “New Gaza Aid Plan, Bypassing U.N. and Billed as Neutral, Originated in Israel”, *The New York Times* (25 May 2025), <https://www.nytimes.com/2025/05/24/world/middleeast/israel-gaza-aid-plan.html>; Yaniv Kubovich, “Official: Israel to Launch Gaza Plan After Trump Mideast Visit; Palestinian Transfer ‘Key Goal’”, *Haaretz* (5 May 2025), <https://www.haaretz.com/israel-news/2025-05-05/ty-article/.premium/israel-to-launch-gaza-plan-after-trump-mideast-visit-palestinian-transfer-key-goal/00000196-a0e3-d9bf-a1b6-e9e30aa80000>.

²⁰⁰ Ishaan Tharoor, “Israeli plans for Gaza draw criticism of ‘concentration camps’”, *The Washington Post* (11 July 2025), <https://www.washingtonpost.com/world/2025/07/11/israel-gaza-humanitarian-concentration-camps/>.

²⁰¹ Gerry Shih, Cate Brown, Claire Parker and Karen DeYoung, “Sweeping overhaul of Gaza aid raises questions of morality and workability”, *The Washington Post* (24 May 2025), <https://www.washingtonpost.com/world/2025/05/24/gaza-humanitarian-foundation-ghf-aid/>.

²⁰² Patrick Kingsley, Ronen Bergman and Natan Odenheimer, “New Gaza Aid Plan, Bypassing U.N. and Billed as Neutral, Originated in Israel”, *The New York Times* (25 May 2025), <https://www.nytimes.com/2025/05/24/world/middleeast/israel-gaza-aid-plan.html>.

²⁰³ “Head of US-backed Gaza aid group resigns, saying he will not abandon ‘principles’”, *The Guardian* (26 May 2025), <https://www.theguardian.com/world/2025/may/26/gaza-humanitarian-foundation-aid-group-jake-wood-resigns>.

²⁰⁴ “USAID review raised ‘critical concerns’ over Gaza aid group days before \$30 million US grant”, *CNN* (8 July 2025), <https://edition.cnn.com/2025/07/08/us/usaid-gaza-humanitarian-foundation-israel-grant>.

babies without provision of safe water, which would have likely caused the deaths of children from contamination.²⁰⁵ Despite these warnings, GHF was fast tracked into operation, with the usual oversight criteria waived by US officials.²⁰⁶ It has not disclosed its funding sources.²⁰⁷ Switzerland in fact has launched proceedings to dissolve GHF's Geneva branch, on the basis that it had failed to meet basic legal requirements.²⁰⁸

V. THE ATTACKS ON PEOPLE SEEKING AID

55. Multiple credible sources — including the UN,²⁰⁹ NGOs,²¹⁰ and local health authorities²¹¹ — have documented that Israeli forces have repeatedly opened fire on Palestinians seeking humanitarian aid at the GHF's privately-run distribution hubs in Gaza. Forensic Architecture's spatial analysis shows that the routes created for civilian access to the aid sites are contiguous with Israeli military routes, effectively forming a militarised network of forced displacement and population control,²¹² and has further demonstrated how “every route to aid in Gaza” has been made “deadly”.²¹³

56. Since 1 June 2025, the UN Human Rights Office documented a string of brutal attacks on civilians seeking humanitarian aid in Gaza. Some of the most horrific and deadly incidents include the 1 June shelling of Palestinians trying to reach GHF distribution points in northwestern Rafah that claimed 32 lives including

²⁰⁵ Yahya Abou-Ghazala and Jennifer Hansler, “USAID review raised ‘critical concerns’ over Gaza aid group days before \$30 million US grant”, *CNN* (8 July 2025), <https://edition.cnn.com/2025/07/08/us/usaaid-gaza-humanitarian-foundation-israel-grant>.

²⁰⁶ Yahya Abou-Ghazala and Jennifer Hansler, “USAID review raised ‘critical concerns’ over Gaza aid group days before \$30 million US grant”, *CNN* (8 July 2025), <https://edition.cnn.com/2025/07/08/us/usaaid-gaza-humanitarian-foundation-israel-grant>.

²⁰⁷ Michelle Nichols and Emma Farge, “What is the new US-backed Gaza aid plan and why doesn't the UN like it?”, *Reuters* (20 May 2025), <https://www.reuters.com/world/middle-east/new-us-backed-gaza-aid-plan-why-un-doesnt-like-it-2025-05-20/>.

²⁰⁸ Olivia Le Poidevin, “Swiss authorities launch proceedings to shut branch of U.S.-backed Gaza aid group”, *Reuters* (2 July 2025), <https://www.reuters.com/world/middle-east/swiss-move-dissolve-gaza-aid-delivery-groups-geneva-branch-2025-07-02/>; Ludovic Rocchi, “La Confédération ordonne la dissolution de la Fondation humanitaire de Gaza à Genève”, *RTS* (2 July 2025), <https://www.rts.ch/info/suisse/2025/article/la-suisse-dissout-la-fondation-humanitaire-de-gaza-controversee-a-geneve-28931244.html>.

²⁰⁹ UN News, *Gaza: Guterres urges probe into killings at food distribution sites* (2 June 2025), <https://news.un.org/en/story/2025/06/1163926#:~:text=June%20%2C%202025-,Risking%20their%20lives,perpetrators%20to%20be%20held%20accountable.%22>.

²¹⁰ Médecins Sans Frontières (MSF) International, *Dozens of Palestinians massacred at US-Israel backed food distribution sites*.. (1 June 2025), *Dozens of Palestinians massacred at US-Israel backed food distribution sites* | MSF. Retrieved 2 June 2025.

²¹¹ Lorenzo Tondo and Malak A Tantesh, “Palestinians gunned down while trying to reach food aid site in Gaza, hospital says”, *The Guardian* (1 June 2025), <https://www.theguardian.com/world/2025/jun/01/palestinians-gunned-down-while-trying-to-reach-food-aid-site-in-gaza-hospital-says>.

²¹² Forensic Architecture, *The militarisation of aid* (17 May 2025), <https://frames.forensic-architecture.org/gaza/updates/the-militarisation-of-aid>.

²¹³ Forensic Architecture, @ForensicArchi, Tweet (18 July 2025), <https://x.com/ForensicArchi/status/1946254211735310444>.

women and children;²¹⁴ and the 17 June massacre, where the Israeli military opened fire on a crowd waiting for UN food trucks, resulting in at least 51 deaths and around 200 injuries.²¹⁵ The OHCHR has highlighted that “[t]here is no information to suggest that the people killed or injured were involved in hostilities or posed any threat to the Israeli military or to staff of GHF distribution points”.²¹⁶ Attacks have continued unrelentingly in July.²¹⁷ On 3 July 2025 at least 21 Palestinians were killed and dozens were injured due to heavy artillery shelling on Palestinians waiting for food trucks in eastern Khan Younis.²¹⁸ One of those killed in the 3 July attacks while waiting for aid was Abdullah Hammad of MSF who worked at Al-Mawasi clinic — the twelfth MSF staff member killed since October 2023.²¹⁹ On 13 July 2025 another account of killing near aid sites was reported. An Israeli airstrike killed at least 10 people, including six children who were waiting beside a water tanker to collect water. The IDF stated that the strike was a ‘technical error.’²²⁰ On 20 July 2025 the Israeli military killed — through firing from “tanks, snipers and other gunfire” — 72 Palestinians and injured 150 for surrounding a WFP convoy carrying food.²²¹

57. By 21 August 2025, 2,018 Palestinians had been killed and at least 14,947 injured near aid sites or aid routes since 27 May 2025,²²² including at the very least “615 in the vicinity of the GHF sites, and 183 presumably on the route of aid

²¹⁴ UN OHCHR, *Israeli military kills 32 Palestinians seeking food aid as ‘militarised humanitarian mechanism’ deepens crisis* (1 June 2025), <https://www.un.org/unispal/document/ohchr-israeli-military-kills-32-palestinians-seeking-food-aid-as-militarised-humanitarian-mechanism-deepens-crisis/>.

²¹⁵ UN OHCHR, *Desperate Palestinians seeking food killed in Gaza* (18 June 2025), <https://www.un.org/unispal/document/ohchr-desperate-palestinians-seeking-food-killed-in-gaza/>.

²¹⁶ UN Palestine, *UN rights office ‘horrified’ by deadly violence at Gaza food distribution sites* (19 June 2025), <https://palestine.un.org/en/296577-un-rights-office-‘horrified’-deadly-violence-gaza-food-distribution-sites?>.

²¹⁷ UN OHCHR, *Palestinians in Gaza continue to be killed by starvation or by bullets from the Israeli military while trying to access food* (22 July 2025), <https://reliefweb.int/report/occupied-palestinian-territory/palestinians-gaza-continue-be-killed-starvation-or-bullets-israeli-military-while-trying-access-food-enar>; UN OHCHR, *Palestinians in Gaza continue to be killed in hundreds against a looming threat of forcible transfer outside Gaza* (11 July 2025), <https://reliefweb.int/report/occupied-palestinian-territory/palestinians-gaza-continue-be-killed-hundreds-against-looming-threat-forcible-transfer-outside-gaza>.

²¹⁸ UN OCHA, *Humanitarian Situation Update #304 | Gaza Strip* (9 July 2025), <https://reliefweb.int/report/occupied-palestinian-territory/humanitarian-situation-update-304-gaza-strip>.

²¹⁹ MSF, ‘Israeli forces killed MSF colleague Abdullah Hammad while he waited for food aid’ (4 July 2025), <https://www.msf.org/msf-mourns-killing-twelfth-colleague-gaza>.

²²⁰ Rory Carroll and agencies, “Israeli airstrike kills at least 10, including six children, at Gaza water station, say health officials”, *The Guardian* (13 July 2025), <https://www.theguardian.com/world/2025/jul/13/dozens-of-palestinians-killed-in-latest-israeli-attacks-near-food-aid-distribution-sites-medics-and-witnesses-say>.

²²¹ WFP, *Gaza Convoy Incident Statement* (20 July 2025), <https://www.wfp.org/news/gaza-convoy-incident-statement>; UN OCHA, *Humanitarian Situation Update #307 | Gaza Strip* (23 July 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-307-gaza-strip>.

²²² UN OCHA, *Humanitarian Situation Update #315 | Gaza Strip* (21 August 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-315-gaza-strip>.

convoys”.²²³ Most of these deaths were due to gunshot injuries.²²⁴ The MSF reports that it treats people who have been wounded while desperately trying to access food every day;²²⁵ treating 71 children for gunshot wounds, 25 of whom were under the age of 15, between 7 June and 24 July alone.²²⁶ The ICRC reports that its field hospital has treated over 3,400 weapon-wounded patients, and recorded over 250 fatalities since the opening of the GHF distribution points — exceeding all mass casualties treated at the hospital in the preceding 12 months.²²⁷ Human Rights organisations and doctors report children seeking aid at the sites being detained and imprisoned by the Israeli military;²²⁸ and adults and children shot at the distribution sites, and that “there seems to be a clustering of different body parts on particular days. So one day, they’re coming in having been shot in the abdomen. Another day they’re coming in having been shot in the head or the neck. Last Saturday we had four young teenage males, all who came in at the same time, having been shot in the testicles.”²²⁹

58. The attacks are so frequent that the number of those killed or injured changes almost daily. The UN Secretary-General has demanded an independent investigation, stressing that it is “unacceptable that Palestinians are risking their lives for food”.²³⁰ The UN High Commissioner for Human Rights has supported this, emphasising that there is “no justification” for Israel’s failures to comply with the binding orders of the International Court of Justice.²³¹

59. On 1 July 2025, more than 160 non-governmental organisations operating in Gaza issued an urgent call for immediate action to end the military-controlled food distributions, describing them as “deadly”.²³² The NGOs warn that “Palestinians in

²²³ Olivia Le Poidevin, “UN reports 798 deaths near Gaza aid hubs in six weeks”, *Reuters* (11 July 2025), <https://www.reuters.com/world/middle-east/798-people-killed-while-receiving-aid-gaza-says-un-human-rights-office-2025-07-11/>; UN, OHCHR / Gaza Aid Points Killings (11 July 2025), <https://media.un.org/unifeed/en/asset/d342/d3422403>.

²²⁴ UN News, *Gaza: ‘Unacceptable’ choice between getting shot or getting fed* (11 July 2025), <https://news.un.org/en/story/2025/07/1165368>.

²²⁵ Médecins Sans Frontières (MSF) International, *Gaza: MSF calls for sustained ceasefire, end of siege, and urgent access to aid as Netanyahu meets with Trump* (7 July 2025), <https://www.doctorswithoutborders.org/latest/gaza-msf-calls-sustained-ceasefire-end-siege-and-urgent-access-aid-netanyahu-meets-trump>.

²²⁶ UN OCHA, *Humanitarian Situation Update #313 | Gaza Strip* (13 August 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-313-gaza-strip>.

²²⁷ ICRC in Israel & OT, @ICRC_ilot, Tweet (9:40 am, 13 July 2025), https://x.com/ICRC_ilot/status/1944300824085065857.

²²⁸ UN OCHA, *Humanitarian Situation Update #307 | Gaza Strip* (23 July 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-307-gaza-strip>.

²²⁹ Ayshah Tull, “Teenagers being shot by Israeli soldiers – British surgeon in Gaza”, *Channel 4* (19 July 2025), <https://www.channel4.com/news/teenagers-being-shot-by-israeli-soldiers-british-surgeon-in-gaza>.

²³⁰ UN News, *Gaza: Guterres urges probe into killings at food distribution sites* (2 June 2025), <https://news.un.org/en/story/2025/06/1163926#:~:text=June%20%2C%202025-,Risking%20their%20lives,perpetrators%20to%20be%20held%20accountable.%22>.

²³¹ UN OHCHR, *Gaza: Attacks around aid distribution site* (3 June 2025), <https://www.un.org/unispal/document/gaza-attacks-around-aid-distribution-site>.

²³² Norwegian Refugee Council, *Gaza: Starvation or gunfire — not a humanitarian response* (1 July 2025), <https://www.nrc.no/news/2025/july/gaza-starvation-or-gunfire-not-a-humanitarian-response>.

Gaza face an impossible choice: starve or risk being shot while trying desperately to reach food to feed their families.”²³³ The Commissioner-General of UNRWA has similarly entreated that:

“Under our watch, #Gaza has become the graveyard of children & starving people. No way out. Their choice is between 2 deaths: starvation or being shot at. The most cruel & machiavellian scheme to kill, in total impunity. Our norms & values are being buried. Inaction will bring more chaos. Time to act is overdue.”²³⁴

VI. MASS TRANSFER OF PALESTINIANS IN GAZA

60. Since March, Israel’s leaders have expedited plans to execute the mass forced displacement of Palestinians from the Gaza Strip. Palestinians are being forcibly driven southwards by Israel’s deliberate relentless, intensified, widespread and systematic aerial bombardments.²³⁵ At the same time, Palestinians have been lured and concentrated into a ghettoised corner of the southern Gaza Strip through Israel’s control of aid distribution, which Israel has weaponised to advance its destruction of the Palestinian people.

61. In May 2025, Prime Minister Netanyahu in an address to the Knesset Foreign Affairs and Defence Committee suggested that Palestinians in Gaza would be pushed southwards and would agree to “leave of their own volition” — We are destroying more and more houses . . . [t]hey will have nowhere to return to”.²³⁶ Israel’s Minister of Finance, explained that as part of the fighting the Israeli military “is moving the population from combat zones . . . The population will reach the south of the [Gaza] Strip, and from there . . . to third-party countries as part of President Trump’s plan . . . we are dismantling Gaza and leaving it as smoking ruins, a total destruction never before seen in the world, and the world isn’t stopping us.”²³⁷ Israeli Minister Gila Gamiel explained that a ‘Migration Administration’, had been established and that the government was working to construct “the infrastructure for

²³³ Norwegian Refugee Council, *Gaza: Starvation or gunfire — not a humanitarian response* (1 July 2025), <https://www.nrc.no/news/2025/july/gaza-starvation-or-gunfire--not-a-humanitarian-response>.

²³⁴ Phillipe Lazzarini, @UNLazzarini, Tweet (11:06 am, 11 July 2025), <https://x.com/UNLazzarini/status/1943597836970385784>.

²³⁵ Forensic Architecture, Israel’s new plan for Gaza (20 May 2025), <https://frames.forensic-architecture.org/gaza/updates/israel-has-designated-the-majority-of-the-gaza-strip-for-evacuation>; Yuval Abraham, “‘Like a video game’: Israel enforcing Gaza evacuations with grenade-firing drones”, +972 Magazine (10 July 2025), <https://www.972mag.com/drones-grenades-gaza-chinese-autel/>.

²³⁶ Nir Hasson, Yarden Michaeli and Avi Scharf, “Rafah Is Gone. Razed to the Ground. And It’s Not the Only City Wiped Out by the Israeli Army”, *Haaretz* (12 June 2025), <https://www.haaretz.com/israel-news/2025-06-12/ty-article-magazine/.premium/rafah-is-gone-razed-to-the-ground-its-not-the-only-city-decimated-by-the-israeli-army/00000197-6506-db73-aff7-7d4ee6bb0000>.

²³⁷ “‘I put politics aside’: Minister Smotrich in a special statement after the aid was introduced”, *C14* (19 May 2025), <https://www.youtube.com/watch?v=STymrqvry2k>.

the departure of Gazans from the Strip, with the aim of allowing the orderly and thorough exit of one million seven hundred thousand Palestinians”.²³⁸

62. On 20 July 2025 Israel issued yet another displacement order, leading to 87.8 percent of Gaza being under displacement orders or within Israeli-militarized zones, and “leaving 2.1 million civilians squeezed into a fragmented 12 per cent of the Strip, where essential services have collapsed”.²³⁹

63. Between 18 March 2025 and 22 July 2025, over 762,500 Palestinians had been newly displaced in the Gaza Strip,²⁴⁰ Palestinians have been forced to flee amidst internet blackouts with no access to lifesaving online information²⁴¹ — forced into confined unsafe spaces with shifting boundaries. Since 18 March 2025 the evacuation orders direct civilians in a general direction without specifying demarcated areas for safe residence.²⁴² Some of these areas are within the ‘buffer zones’ established by Israel. The buffer zone itself has “expanded to encompass the municipality of Rafah, as well as areas to the east of Khan Younis and in the north of Gaza.”²⁴³

64. Israel continues to block the entry of basic necessities such as tents and tarpaulins, and in the meagre areas left for the displaced in the Gaza Strip, 75 percent of those areas have no space for additional tents.²⁴⁴ One fifth of displaced Palestinians in some areas are sleeping rough — outdoors in the street, in open areas, in damaged buildings.²⁴⁵ Almost all of the Gaza Strip is inaccessible to Palestinians — 88 percent of the Gaza Strip is under evacuation order or is characterised as a military zone, including areas containing 90 percent of Gaza’s water reservoirs.²⁴⁶ 425,000 Palestinians are crammed into the Al Mawasi “safe

²³⁸ Gila Gamliel, @GilaGamliel, Tweet (5:42 pm, 18 May 2025), <https://x.com/GilaGamliel/status/1924128486920200632>.

²³⁹ UN OCHA, *Gaza: OCHA warns mass displacement order yet another blow to fragile lifelines* (20 July 2025), <https://www.ochaopt.org/content/gaza-ocha-warns-mass-displacement-order-yet-another-blow-fragile-lifelines>; Jan Egeland, @NRC_Egeland, Tweet (12:51 pm, 21 July 2025), https://x.com/NRC_Egeland/status/1947247933612560667.

²⁴⁰ UN OCHA, *Humanitarian Situation Update #302 | Gaza Strip* (2 July 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-302-gaza-strip>.

²⁴¹ UN OCHA, *Gaza Humanitarian Response Update | 22 June - 5 July 2025* (8 July 2025), <https://www.ochaopt.org/content/gaza-humanitarian-response-update-22-june-5-july-2025>; Forensic Architecture @ForensicArchi, Tweet (3:22 PM, 6 June 2025), <https://x.com/ForensicArchi/status/1930978721516650947>.

²⁴² Forensic Architecture, *Confirmed attacks and evacuation orders since 18 March 2025* (29 May 2025), <https://frames.forensic-architecture.org/gaza/updates/confirmed-attacks-and-evacuation-orders-since-18-march-2025>.

²⁴³ Forensic Architecture, *The expanding buffer zone* (21 May 2025), <https://frames.forensic-architecture.org/gaza/updates/the-expanding-buffer-zone>.

²⁴⁴ UN OCHA, *Gaza Humanitarian Response Update | 22 June - 5 July 2025* (8 July 2025), <https://www.ochaopt.org/content/gaza-humanitarian-response-update-22-june-5-july-2025>.

²⁴⁵ UN OCHA, *Gaza Humanitarian Response Update | 22 June - 5 July 2025* (8 July 2025), <https://www.ochaopt.org/content/gaza-humanitarian-response-update-22-june-5-july-2025>.

²⁴⁶ UN OCHA, *Reported impact snapshot | Gaza Strip* (23 July 2025), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-23-july-2025>; UN OCHA, *Gaza Humanitarian Response Update | 22 June - 5 July 2025* (8 July 2025), <https://www.ochaopt.org/content/gaza-humanitarian-response-update-22-june-5-july-2025>.

zone” . In the three months between 18 March and 16 June, the UN Office of the High Commissioner of Human Rights documented 112 attacks on the Al-Mawasi killing 380 Palestinians, including at least 158 women and children.²⁴⁷ Following orders to mass evacuate Khan Younis, Israel bombed the tents of the forcibly displaced. From June 26, Israel bombed ten schools sheltering displaced Palestinians, over five days.²⁴⁸

65. Israel’s Minister of Defence announced a plan on 7 July to create a new zone on the destroyed ruins of Rafah to contain first displaced Palestinians from Al Mawasi and later the entire population of Gaza.²⁴⁹ Israel is planning the internment of two million Palestinians, in the ashen rubble of flattened destroyed Rafah,²⁵⁰ in what has been described by head of the United Nations Relief and Works Agency (UNRWA), Phillippe Lazzarini, as the creation of “concentration camps”, to facilitate a “second Nakba”.²⁵¹ As cited in this Dossier, he is not alone in describing the planned transfer as a concentration camp.²⁵² Palestinians are being encouraged to “voluntarily emigrate” from the Gaza Strip to other countries in acts of mass forced displacement. But the true genocidal intention is expressed with brazen clarity: Israel’s Minister of National Security tweeted, “they must be crushed to dust, starved to death, and not given air through humanitarian aid that provides them oxygen. A complete siege, military crushing, encouragement of migration, and settlement — these are the keys to absolute victory”.²⁵³

VII. GENOCIDAL INTENTION

66. The *urgency* of protecting Palestinians from further existential threat of eradication as a group in whole or in part is further affirmed by the continued — and continuously escalating — genocidal intent displayed through not just Israel’s

²⁴⁷ UN OCHA, *Humanitarian Situation Update #302 | Gaza Strip* (2 July 2025), <https://www.un.org/unispal/document/humanitarian-situation-update-302-gaza-strip/>.

²⁴⁸ UN OCHA, *Reported impact snapshot | Gaza Strip* (2 July 2025), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-2-july-2025>

²⁴⁹ Yaniv Kubovich and Liza Rozovsky, “Defense Minister Says Israel Plans to Concentrate All Gaza’s Population in ‘Humanitarian’ Zone Built on Rafah’s Ruins”, *Haaretz* (7 July 2025), <https://www.haaretz.com/israel-news/2025-07-07/ty-article/.premium/defense-minister-israel-to-concentrate-all-gaza-population-in-rafah-humanitarian-zone/00000197-e56a-d1ad-ab97-e5ef764e0000>.

²⁵⁰ Forensic Architecture, @ForensicArchi, Tweet (8:43 PM, 23 May 2025), <https://x.com/ForensicArchi/status/1925985971838804149>; ישראל כ”ץ Israel Katz @Israel_katz, Tweet (6:19 PM, 11 July 2025), https://x.com/Israel_katz/status/1943706778895515839.

²⁵¹ UNRWA, *UNRWA Commissioner-General on Gaza: A second Nakba?* (9 July 2025), <https://www.unrwa.org/newsroom/official-statements/unrwa-commissioner-general-gaza-second-nakba>.

²⁵² Ishaan Tharoor, “Israeli plans for Gaza draw criticism of ‘concentration camps’”, *The Washington Post* (11 July 2025), <https://www.washingtonpost.com/world/2025/07/11/israel-gaza-humanitarian-concentration-camps/>; The New Arab Staff, “Katz proposes ‘concentration camp’ on Rafah’s ruins for Gaza’s Palestinians”, *The New Arab* (8 July 2025), <https://www.newarab.com/news/katz-proposes-rafah-concentration-camp-gazas-palestinians>

²⁵³ Itamar Ben-Gvir, @itamarbengvir, Tweet (7:52, 8 July 2025), <https://x.com/itamarbengvir/status/1942461855919636849>.

aggravating patterns of conduct as highlighted above, but also through Israeli officials' statements.

67. After its March 2025 decision to impose a full blockade and prevent all goods and supplies from entering Gaza,²⁵⁴ a renewed cut-off of all electricity,²⁵⁵ and its continuous incitement to open the gates of hell on Gaza²⁵⁶ — Israel installed the deadly GHF mechanism²⁵⁷ in order to further its destruction of the Palestinian group while seeking to escape international scrutiny for “violations of international law that could implicate top military and political figures, particularly those in the IDF Southern Command.”²⁵⁸ As per the Prime Minister, the GHF would be needed “[i]n order to preserve our freedom of military operation and allow our good friends to keep supporting us”.²⁵⁹ Israel’s Minister of Finance and Minister in the Ministry of Defence (Security Cabinet member) explained the allowance of some aid into Gaza as follows:

“I am the one who led in practice the [development of] alternatives via civilian companies and I can tell you, on my word: what was is not what will be in the future. A minimal amount of food and medicine will be allowed in

²⁵⁴ Prime Minister of Israel, @IsraeliPM, Tweet (4:59 pm, 2 March 2025), <https://x.com/IsraeliPM/status/1896213902486307134>.

²⁵⁵ Eli Cohen, Minister of Energy and Infrastructure, @elico1, Tweet (5:23 pm, 9 March 2025), <https://x.com/elico1/status/189875646322260177>: “I have now signed an order to cut off electricity to the Gaza Strip immediately. Enough talk, it's time for action!”

²⁵⁶ See e.g. Bezalel Smotrich, Minister of Finance, @bezalelsm, Tweet (10:09 am, 2 March 2025), <https://x.com/bezalelsm/status/1896110709269823511>: “The decision we made tonight to completely halt the entry of humanitarian aid into Gaza, until the destruction or complete surrender of Hamas, and all our hostages are returned, is an important step in the right direction. ‘The threshold of the gates of Hell.’ Now we need to open these gates on [our] cruel enemy as quick and deadly as possible, until total victory. We remained in the government to ensure this, and G-d willing so it will be.”; May Golan, Minister of Social Equality and the Advancement of Women, @GolanMay, Tweet (11:29 am, 2 March 2025), <https://x.com/GolanMay/status/1896130793518379478>: “I applaud the Prime Minister on the Cabinet's important decision, led by him, to halt humanitarian aid to the inhumane [people] in Gaza . . . If Hamas refuses to comply to the most elementary demand there is - to return all hostages and lay down its terrorist arms - we must open the gates of hell and return to fighting in a manner Gaza has never experienced before . . .”.

²⁵⁷ “The IDF is the Client”, see Senator Chris Van Hollen, @ChrisVanHollen, Tweet (5:02 pm, 29 July 2025), <https://x.com/ChrisVanHollen/status/1950210274813681964> [19:35-24:30]. See also Benjamin Netanyahu, @netanyahu, Tweet (10:14 am, 10 July 2025), <https://x.com/netanyahu/status/1943222156625670368>, [2:50]; Toi Staff, “Report: Israel contributed NIS 700m to Gaza aid mechanism it claims not to fund”, *Times of Israel* (5 June 2025), <https://www.timesofisrael.com/report-israel-contributed-nis-700m-to-gaza-aid-mechanism-it-claims-not-to-fund/>; “Prime Minister Netanyahu holds a press conference”, *Israeli PM* (21 May 2025), <https://www.youtube.com/live/7jsT5U70H44>, [8:05-9:07]: “To prevent Hamas from taking control over humanitarian aid, we developed a different plan along with the US. . . Stage 2, which will happen in the next few days, opening food distribution locations through American companies, who will be secured by the IDF. And Stage 3, while seizing control of the Gaza Strip’s territories, [is] creating a “sterile zone” in the south of the Strip, where the population will be evacuated [away] from combat areas for their protection. . .”

²⁵⁸ Yoav Zitun, “Without hostage deal or Hamas' defeat: IDF prepares to resume aid deliveries to Gaza”, *Ynet* (4 July 2025), <https://www.ynetnews.com/article/r172yjwale>.

²⁵⁹ “Prime Minister Netanyahu holds a press conference”, *Israeli PM* (21 May 2025), <https://www.youtube.com/live/7jsT5U70H44>, [6:31-07:55].

for Gaza's population, out of necessity. . . In a few days, G-d willing, the American company will get to work . . . The required minimal amount will reach the population, simply so the world doesn't stop us and accuse us of war crimes. No one has cried more for this — verbally and in writing, inside and outside the Cabinet — more than I have, and you know it. And praise G-d, I succeeded. . . Only the smallest amount of aid will be allowed entry in the coming days . . . Civilians in Gaza will receive a plate of food and pita bread, and that's it. That is exactly what we see in the videos, people standing in line and waiting for a bowl of some soup to be poured to them. This does not reach Hamas and it allows civilians to eat, and [allows] our global friends to continue and provide us international cover from the Security Council and the Hague Court, and for us to keep fighting, G-d willing, until victory. . . The truth is that until the last of the hostages returns, we shouldn't even give water to the Gaza Strip. But in reality, if we act like this, the world will force us to stop the war immediately and lose.”²⁶⁰

68. Even with the daily extermination of starving Palestinians and destruction of aid distribution points throughout Gaza²⁶¹ and through the GHF mechanism²⁶² — described by Israeli soldiers as a “killing field” involving “live fire with everything imaginable: heavy machine guns, grenade launchers, mortar”²⁶³ — Israel’s officials continue to call for a bombing of all basic energy infrastructure and an end to any

²⁶⁰ “‘I’ve set politics aside’: Minister Smotrich in a special announcement following the entry of aid”, *Channel 14* (19 May 2025), <https://youtu.be/STymrqvry2k?si=EFmM8YjxoNprPx8L>.

²⁶¹ See e.g., UN OCHA, *Humanitarian Situation Update #304 | Gaza Strip* (9 July 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-304-gaza-strip>.

²⁶² See e.g., UN OHCHR, *Desperate Palestinians seeking food killed in Gaza* (18 June 2025), <https://reliefweb.int/report/occupied-palestinian-territory/desperate-palestinians-seeking-food-killed-gaza>; UN OCHA, *Humanitarian Situation Update #304 | Gaza Strip* (9 July 2025), <https://www.ochaopt.org/content/humanitarian-situation-update-304-gaza-strip>; UN OCHA, UN Secretary General, *Secretary-General's press encounter on the situation in Gaza* (27 June 2025), <https://www.ochaopt.org/content/secretary-generals-press-encounter-situation-gaza>; UNICEF, *Statement by UNICEF Executive Director Catherine Russell on children killed during a nutrition aid distribution in the Gaza Strip* (10 July 2025), <https://www.unicef.org/press-releases/statement-unicef-executive-director-catherine-russell-children-killed-during>.

²⁶³ Nir Hasson, Yaniv Kubovich and Bar Peleg, “‘It’s a Killing Field’: IDF Soldiers Ordered to Shoot Deliberately at Unarmed Gazans Waiting for Humanitarian Aid”, *Haaretz* (27 June 2025), <https://www.haaretz.com/israel-news/2025-06-27/ty-article-magazine/.premium/idf-soldiers-ordered-to-shoot-deliberately-at-unarmed-gazans-waiting-for-humanitarian-aid/00000197-ad8e-de01-a39f-ffbe33780000>; see also “US contractors say their colleagues are firing live ammo as Palestinians seek food in Gaza”, *Associated Press* (2 July 2025), <https://youtu.be/63XTo2EyLZA>.

aid to Gaza,²⁶⁴ and clearly state they will “take action against any attempt to break the blockade [on Gaza]”,²⁶⁵ all while celebrating Israel’s continued effective deprivation of aid and basic services to the Gaza Strip.²⁶⁶ Israel’s Minister of Culture Miki Zohar admitted that “[f]or the first time, Netanyahu said in the committee . . . that receiving aid would be conditional on the Gazans who receive it not returning to the places from which they will arrive at the aid distribution complexes.”²⁶⁷ — further exemplifying Israel’s weaponisation of aid to induce forced displacement.²⁶⁸

69. Israel’s Officials have also continued to implement,²⁶⁹ and admit their plans for the forced displacement and ethnic cleansing of Palestinians out of Gaza, with

²⁶⁴ See e.g. Minister of National Security Itamar Ben-Gvir in "This morning with Aryeh Golan", Kan Radio (5 May 2025), <https://www.kan.org.il/content/kan/kan-b/p-9969/>, [1:02:48 – 1:03:46]: "But if Israel would come forward and tell President Trump: these are Nazis, Nazis shouldn't receive food, they should be bombed. If our hostages have no food, the Nazis shouldn't have any food. Nazis don't need electricity, we should bomb all their generators. If our hostages don't have electricity, let them have no electricity. . . we need to explain to him that this aid goes to Hamas, and Hamas are Nazis, and they shouldn't be given a single grain of food. Not only [should we] not give them, Not only [should we] not give them, but [we should] bomb all of their food reserves. This is my opinion, this is my position. I think Israel has to try it, and that's what I'm going for." See also Itamar Ben-Gvir, @itamarbengvir, Tweet (3:18 pm, 3 March 2025), <https://x.com/itamarbengvir/status/1896565867321733513>: ". . . The government should also order the bombing of aid stockpiles accumulated in huge quantities in Gaza during and prior to the ceasefire, as well as order the complete shutdown of electricity and water. . ."; Minister of Finance and Minister in the Ministry of Defence, Bezalel Smotrich, @bezalelsm, Tweet (8:11 am, 8 July 2025), <https://x.com/bezalelsm/status/1942466577745477865>: "Alongside this, I call upon the Prime Minister and the Chief of Staff to immediately stop the folly of sending aid to the enemy battling our forces and killing our fighters . . ."; Minister of Culture, Miki Zohar, @zoharm7, Tweet (10:26 am, 16 April 2025), <https://x.com/zoharm7/status/1912422324034293879>: "The despicable murderers in Gaza do not deserve any humanitarian aid from a civilian or military system. Only hellfire for the terrorism instigators until the last of our captive brothers and sisters will return home safely."

²⁶⁵ Israel Katz, @Israel_katz, Tweet (1:45 pm, 8 June 2025), https://x.com/Israel_katz/status/1931679051657175188.

²⁶⁶ Minister of Energy and Infrastructure, Eli Cohen, @elicoh1, Tweet (4:07 pm, 10 April 2025), <https://x.com/elicoh1/status/1910333877924606342>: "The decision I led to cut off Gaza's electricity is right, morally and security-wise! Glad the petition to force me to reconnect electricity was dismissed outright. . ."

²⁶⁷ "After disapproving of Netanyahu's words: Limor Son Har-Melech stunned the Knesset committee", *Maariv* (11 May 2025), <https://www.maariv.co.il/news/military/article-1195594>.

²⁶⁸ See also, Jonathan Landay and Adam Roston, "Exclusive: Proposal outlines large-scale 'Humanitarian Transit Areas' for Palestinians in Gaza", *Reuters* (11 July 2025), <https://www.reuters.com/world/middle-east/us-backed-aid-group-proposed-human-transit-areas-palestinians-gaza-2025-07-07/>.

²⁶⁹ See Dana Karni, Tim Lister and Nadeen Ebrahim, "Israel approves controversial proposal to facilitate emigration of Palestinians from Gaza", *CNN* (24 March 2025), <https://edition.cnn.com/2025/03/24/middleeast/israel-approves-proposal-to-facilitate-emigration-of-palestinians-from-gaza-intl>; Johan Jeremy Bob, "Katz forms new body to assist Gaza Palestinians to 'voluntarily emigrate'", *Jerusalem Post* (17 February 2025), <https://www.jpost.com/breaking-news/article-842566>; and prior: Minister of Defence of Israel, Israel Katz, @Israel_katz, Tweet (9:28 am, 16 April 2025), https://x.com/israel_katz/status/1912407758869057781: "In parallel, the plan for the voluntary relocation of Gaza's residents is being advanced" and Minister of Defence of Israel, Israel Katz, @Israel_katz, Tweet (9:23 am, 6 February 2025), https://x.com/Israel_katz/status/1887416931365314902.

the Prime Minister working on the implementation of Trump's forced transfer plan,²⁷⁰ and calling it "a plan so right and so revolutionary, and which says [one] simple thing: residents of Gaza who want to exit [the Strip], will be able to get out."²⁷¹ Already in March 2025, the "voluntary emigration" plan was formally adopted by a Cabinet Decision²⁷² — and orders to Commanders in May involved the 'concentration and movement' of the Palestinian population in Gaza, affirming the adoption of the forced transfer plan.²⁷³ Israel's Minister of Science and Technology, Gila Gamliel, posted an AI clip promoting her —euphemistically called — "voluntary migration plan" of a future Gaza, rebuilt without Palestinians.²⁷⁴

70. On 7 July 2025, Defence Minister Katz (Security Cabinet member) affirmed the emigration plan would happen and that the Prime Minister was already leading efforts to explore countries willing to absorb Palestinians from Gaza, further conveying to the press plans for the concentration and confinement of over 600 000

²⁷⁰ See e.g. most recent: "Netanyahu says U.S. and Israel working on plan to relocate Palestinians as ceasefire talks go on", *CBC* (7 July 2025), <https://www.cbc.ca/news/world/trump-netanyhau-white-house-dinner-1.7579335>.

²⁷¹ "Prime Minister Netanyahu holds a press conference", *Israeli PM* (21 May 2025), <https://www.youtube.com/watch?v=7jsT5U70H44&t=579s>, [09:12].

²⁷² See Dana Karni, Tim Lister and Nadeen Ebrahim, "Israel approves controversial proposal to facilitate emigration of Palestinians from Gaza", *CNN* (24 March 2025), <https://edition.cnn.com/2025/03/24/middleeast/israel-approves-proposal-to-facilitate-emigration-of-palestinians-from-gaza-intl>.

²⁷³ Yaniv Kubovich, "Official: Israel to Launch Gaza Plan After Trump Mideast Visit; Palestinian Transfer 'Key Goal'", *Haaretz* (5 May 2025), <https://www.haaretz.com/israel-news/2025-05-05/ty-article/.premium/israel-to-launch-gaza-plan-after-trump-mideast-visit-palestinian-transfer-key-goal/00000196-a0e3-d9bf-a1b6-e9e30aa80000>; Yaniv Kubovich, "'A Punch in the Gut' | Israeli Army Places Returning the Hostages at the Bottom of Its Gaza Campaign Goals, Despite Promises to Families", *Haaretz* (8 May 2025), <https://www.haaretz.com/israel-news/2025-05-08/ty-article/.premium/israeli-army-places-returning-the-hostages-at-the-bottom-of-its-gaza-campaign-goals/00000196-ac14-dce0-abfe-ff7c57670000>. See also Itamar Eichner, "Security Cabinet approved plans, political source: this includes occupying the Strip and remaining there", *Ynet* (5 May 2025), <https://www.ynet.co.il/news/article/sjxfeoblbgg>; "Netanyahu clarified during the [Cabinet] meeting that this plan differs from its predecessors in that 'we are moving [away] from raids as a method [and towards] to the conquest and ongoing occupation of territory.' The Prime Minister added that he continues to promote US President Donald Trump's plan to allow the voluntary departure of Gazans, and that 'communication is underway with several countries about the issue.'"; Minister of Communications, Shlomo Karhi, @Shlomo_karhi, Tweet (11:14 am, 5 May 2025), https://x.com/shlomo_karhi/status/1919319844702265390: "The Cabinet's decision? [A] First step on the road to total victory . . . No blinking. Forcefully. With G-d's help."

²⁷⁴ Gila Gamliel, @GilaGamliel, Tweet (2:07 pm, 22 July 2025), <https://x.com/GilaGamliel/status/1947629456127869012>.

Palestinians in camps in Rafah.²⁷⁵ Israeli press further reported that “each Gazan entering the humanitarian zone will undergo inspection to ensure they carry no weapons and are not affiliated with Hamas” and that “[c]onsequently, those outside these zones will later be identified as Hamas terrorists, providing legal justification for their elimination.”²⁷⁶

71. Such transfer plans and their implementation accompanied the Prime Minister’s statements and accompanying Cabinet decision on the full conquest of Gaza: “we are moving [away] from raids as a method [and towards] to the conquest and ongoing occupation of territory”.²⁷⁷ Israel’s conquest and forced displacement policies come in the wake of its total destruction of Gaza,²⁷⁸ some 92 percent of Gaza’s housing units destroyed,²⁷⁹ and Israeli officials arming gangs to — after its

²⁷⁵ Yaniv Kubovich and Liza Rozovsky, “Defense Minister Says Israel Plans to Concentrate All Gaza’s Population in ‘Humanitarian’ Zone Built on Rafah’s Ruins”, *Haaretz* (7 July 2025), <https://www.haaretz.com/israel-news/2025-07-07/ty-article/.premium/defense-minister-israel-to-concentrate-all-gaza-population-in-rafah-humanitarian-zone/00000197-e56a-d1ad-ab97-e5ef764e0000>; Emanuel Fabian and Jacob Magid, “Katz calls for confining all Gazans in ‘humanitarian city’ built over Rafah’s ruins”, *Times of Israel* (7 July 2025), <https://www.timesofisrael.com/katz-calls-for-confining-all-gazans-in-humanitarian-city-built-over-rafahs-ruins/>; “Katz proposes ‘concentration camp’ on Rafah’s ruins for Gaza’s Palestinians”, *The New Arab* (8 July 2025), <https://www.newarab.com/news/katz-proposes-rafah-concentration-camp-gazas-palestinians>; Liza Rozovsky, “Israeli Official: Netanyahu Supports Plan to Concentrate Gazans Into ‘Humanitarian City’”, *Haaretz* (8 July 2025), <https://www.haaretz.com/israel-news/2025-07-08/ty-article/.premium/israeli-official-netanyahu-supports-plan-to-concentrate-gazans-into-humanitarian-city/00000197-eb03-d0a0-a1df-efffa1bb0000>.

²⁷⁶ Shachar Kleiman and Ariel Kahana, “Report: Israel considering partial withdrawal, ceasefire to be announced over weekend”, *Israel Hayom* (10 July 2025), <https://www.israelhayom.com/2025/07/10/report-israel-considering-partial-withdrawal-as-part-of-deal/>.

²⁷⁷ Prime Minister of Israel, Benjamin Netanyahu, @netanyahu, Tweet (4:06 pm, 5 May 2025), <https://x.com/netanyahu/status/1919393154320519246>, [00:33-01:20]: “. . . One thing will become clear: there won’t be movement in and out [of forces], [where] we recruit reserve forces to come and seize land, [then] leave the territory and execute operational raids on what remains. We are not there, that is not the purpose [of this campaign]. [It is] the opposite intention. . . “. See also Tia Goldenberg and Sam Mendick, “Israel plans to seize Gaza under a new plan, officials say”, *AP* (5 May 2025), <https://apnews.com/article/israel-palestinians-amas-war-news-05-05-2025-d22caabfd2cf89e83fe06e649e6438ba>; Minister of Finance and Minister in the Ministry of Defence, Bezalel Smotrich, @bezalelsm, Tweet (8:33 am, 6 May 2025), <https://x.com/bezalelsm/status/1919641607701139856>: “For the first time we spoke non apologetically [lit. without shame] about conquest, the IDF is going to conquer the Gaza Strip, it is going to hold the area for a long time and put an end to the terrible folly where we provide logistic supply to our enemy! . . .”; Jacob Magid, “Bucking IDF warnings, security cabinet approves Netanyahu plan to conquer Gaza City”, *Times of Israel* (8 August 2025), <https://www.timesofisrael.com/bucking-idf-warnings-security-cabinet-approves-netanyahus-plan-to-conquer-gaza-city/>; “Netanyahu announces Israel will take control of Gaza”, *Fox News* (7 August 2025), <https://www.youtube.com/watch?v=4Yy3DsNZ8A&t=50s>.

²⁷⁸ See e.g. Meron Rapoport and Oren Ziv, “Render it unusable’: Israel’s mission of total urban destruction”, *+972 Magazine* (15 May 2025), <https://www.972mag.com/israel-gaza-total-urban-destruction/>.

²⁷⁹ UN OCHA, *Reported impact snapshot | Gaza Strip* (9 July 2025) (9 July 2025), <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-9-july-2025>.

killing, maiming and starvation — further shatter Gaza’s social fabric.²⁸⁰ Support for such total destruction has been vocal among Israeli officials:

- The Prime Minister stated on 11 May 2025: “We are demolishing more and more houses, they have nowhere to return to. The only sensible outcome will be the desire of Gazans to emigrate out of the Strip. Our main problem is in the receiving countries.”²⁸¹
- Israel Katz, Minister of Defence and Security Cabinet Member, posted a picture of a completely flattened part of Gaza on 11 July 2025, stating: “After Rafah - Beit Hanoun. There’s no shelter for terrorism.”²⁸² After his approval of plans for the large-scale assault on Gaza City, he reportedly promised on 21 August 2025: “Gaza City will look like Beit Hanoun”.²⁸³
- Minister of Finance and Minister in the Ministry of Defence, Bezalel Smotrich stated on 19 May 2025: “We occupy, purge [the area], and stay until Hamas is destroyed. Along the way, we are destroying everything that is still left of the Strip, simply because everything there is one big city of terrorism. . . we are dismantling Gaza and leaving it as smoking ruins, a total destruction never before seen in the world, and the world isn’t stopping us. There is pressure, there are some who critique and attack, who try to stop — they fail. . .”²⁸⁴
- Minister of National Security (Security Cabinet member), Itamar Ben-Gvir stated on 8 July 2025: “. . . A total siege, military crushing, encouragement of emigration, and settlement — these are the keys to total victory . . .”²⁸⁵ In detention facilities where Palestinian captives are held and subjected to

²⁸⁰ Nour El Assy, “Israel is arming gangs to fracture Gaza’s society from the inside”, *The New Humanitarian* (25 June 2025), <https://www.thenewhumanitarian.org/first-person/2025/06/25/israel-arming-gangs-fracture-gazas-society-inside>; “Who are the ‘ISIS-linked, aid-stealing’ Gaza militia supported by Israel?”, *The New Arab* (6 June 2025), <https://www.newarab.com/news/who-are-isis-linked-gaza-militia-backed-israel>; “Netanyahu: ‘Arming militias in Gaza? It only does good’”, *Ynet News* (5 June 2025), <https://www.ynet.co.il/yedioth/article/yokra14396902>: “Prime Minister Netanyahu responded: ‘following the advice of security agencies, we operated clans that oppose Hamas in Gaza. It only does good and saves the lives of IDF soldiers.’ . . . This is a secret operation led by the Shin Bet and ordered by Prime Minister Netanyahu, which included the delivery of dozens to hundreds of pistols and Kalashnikov rifles from Israel to the Palestinian group in Rafah.”

²⁸¹ Avraham Bloch, “After disapproving of Netanyahu’s words: Limor Son Har-Melech stunned the Knesset committee”, *Maariv* (11 May 2025), <https://www.maariv.co.il/news/military/article-1195594>.

²⁸² Minister of Defence, Israel Katz, @Israel_katz, Tweet (6:19 pm, 11 July 2025), https://x.com/Israel_katz/status/1943706778895515839.

²⁸³ I24NEWS, @i24NEWS_HE, Tweet (9:33 am, 21 August 2025), https://x.com/i24NEWS_HE/status/1958432321289195537.

²⁸⁴ “‘I’ve set politics aside’: Minister Smotrich in a special announcement following the entry of aid”, *Channel 14* (19 May 2025), <https://www.youtube.com/watch?v=STymrqvry2k>.

²⁸⁵ Minister of National Security, Itamar Ben-Gvir, @itamarbengvir, Tweet (7:52 am, 8 July 2025), <https://x.com/itamarbengvir/status/1942461855919636849>.

torture, cruel, inhumane and degrading treatment,²⁸⁶ the Minister has put up pictures of the destruction of Gaza. Pointing at those pictures, he stated: “[L]ook at this, this is what they see in the morning when they go out for their yard time, this is what they see. And one of them, I think, recognised his house here. This is how it should look.”²⁸⁷

72. The intent to destroy Palestinians is moreover not limited to Palestinians in Gaza alone with *e.g.* Israel’s Minister of Energy and Infrastructure (Security Cabinet member), stating: “[t]errorism raising its head must be crushed with an iron fist. In Gaza, and in Judea and Samaria, every place where despicable terrorists depart from to harm Jews must be eradicated”²⁸⁸ and the Minister of Finance stating: “[w]e must demolish terrorism nests in Judea and Samaria just as we are demolishing Rafah, Khan Younis and Gaza. Bruqin and [Kafr] ad-Dik should look like Shuja’iyya and Tel al-Sultan.”²⁸⁹ The intent vis-à-vis Palestinians in the West Bank including East Jerusalem is further clarified through a letter signed by 15 Ministers — including the Deputy Prime Minister (Minister of Justice) and the Minister of Defence — demanding the application of full Israeli sovereignty to the West Bank by 27 July 2025.²⁹⁰ The Knesset passed a resolution on 23 July 2025, with 71 to 13 votes declaring that the West Bank is “an inseparable part of the Land of Israel, the historical, cultural and spiritual homeland of the Jewish people” and that “Israel has the natural, historical and legal right to all of the territories of the

²⁸⁶ 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> (‘Commission of Inquiry Report (11 September 2024)’), p. 20 - 22, paras. 101 - 110 ; UN HRC, “*More than a human can bear*”: *Israel’s systematic use of sexual, reproductive and other forms of gender-based violence since 7 October 2023*, A/HRC/58/CRP.6 (6 May 2025), [a-hrc-58-crp-6.pdf](https://undocs.org/A/HRC/58/CRP.6), p. 40 - 44, paras. 185 - 208.

²⁸⁷ B.M., @ireallyhateyou, Tweet (10:28 am, 20 August 2025), <https://x.com/ireallyhateyou/status/1958083812065161691>.

²⁸⁸ Minister of Energy and Infrastructure, Eli Cohen, @elico1, Tweet (7:48 am, 15 May 2025), <https://x.com/elico1/status/1922891899263746448>.

²⁸⁹ Minister of Finance, Bezalel Smotrich, @bezalelsm, Tweet (6:48 am, 15 May 2025), <https://x.com/bezalelsm/status/1922876744912011773>.

²⁹⁰ Minister of Finance, Bezalel Smotrich, @bezalelsm, Tweet (7:18 pm, 2 July 2025), <https://x.com/bezalelsm/status/1940460076843913546>. Ministers included: Yariv Levin, Deputy Prime Minister and Minister of Justice (Security Cabinet member); Israel Katz, Minister of Defence (Security Cabinet member); Miri Regev, Minister of Transport and Road Safety (Security Cabinet member); Eli Cohen, Minister of Energy and Infrastructure (Security Cabinet member); Avi Dichter, Minister of Agriculture and Food security (Security Cabinet member); Makhlof (Miki) Zohar, Minister of Culture and Sport; Yoav Kisch, Minister of Education; Nir Barkat, Minister of Economy and Industry; Shlomo Karhi, Minister of Communications; Haim Katz, Minister of Tourism and acting Minister of Construction and Housing; Gila Gamliel, Minister of Innovation, Science and Technology; Amichai Chikli, Minister for Diaspora Affairs and Combating Antisemitism; Idit Silman, Minister of Environmental Protection; May Golan, Minister for Social Equality and Minister for Women’s Empowerment; Dudi Amsalem, Minister in the Ministry of Justice, Minister of Regional Cooperation and government-Knesset Minister liaison.

Land of Israel [the territory of mandatory Palestine]”.²⁹¹ The Prime Minister also openly expressed his commitment to a “greater Israel”.²⁹²

73. These statements all occur in the context of an overall genocidal policy, affirmed repeatedly through further statements by Israeli officials evidencing their genocidal intent:

- On 24 July 2025, Minister of Heritage Amichai Eliyahu stated in a radio interview: “Anyone who isn’t brainwashed can look at reality as it is and see how murderous they are . . . We’re starving them? They are starving them! The day they return the hostages, there will be no hunger there. The day they kill the Hamas terrorists, there will be no more hunger there. Is it our concern? It is utter insanity! It is madness. We have lost human morality, not just Jewish morality. They are holding our hostages. They support Hamas. They give them power. We have to feel sorry for these scum? Have we gone mad? Is that Jewish morality, to feel pity for Hitler? To pity Nazis, to pity Hamas? [...] There won’t be settlement in cantons. All of Gaza will be Jewish. There won’t be settlements enclosed in a fence. There will be [unintelligible], there’s Arabs in Israel as well, we’re not racists. We fight against those who fight us. We fight against those who hate us and those who threaten our lives. There’s Arabs who live in Israel, and whoever respects the State of Israel’s laws, they receive rights like in no other Arab state, not in Jordan and not in Turkey and not anywhere else. [. . .] In the meantime the government is racing ahead for Gaza to be wiped out. Meanwhile [unintelligible] we are wiping out this evil, wiping out the population that has been educated on Mein Kampf, and that’s where we’re racing...”²⁹³
- On 26 May 2025, the Prime Minister — at a rally celebrating Israel’s occupation and annexation of Jerusalem — characterised Israel’s assault on Gaza once more as “. . . a war of good against evil. First and foremost, a determined war that is being fought on the battlefield. It is being fought against human animals, against monsters, who attacked us with appalling

²⁹¹ Sam Sokol *et al*, “Knesset votes 71-13 for non-binding motion calling to annex West Bank”, *Times of Israel* (23 July 2025), <https://www.timesofisrael.com/knesset-votes-71-13-for-non-binding-motion-calling-to-annex-west-bank/>.

²⁹² The term Greater Israel (also: Eretz Israel) is used to refer to a vision of Israel that includes at least also the West Bank, including East Jerusalem, the Gaza Strip, and the Golan Heights, see: “Netanyahu says he’s on a ‘historic and spiritual mission,’ also feels a connection to vision of Greater Israel”, *Times of Israel* (12 August 2025), https://www.timesofisrael.com/liveblog_entry/netanyahu-says-hes-on-a-historic-and-spiritual-mission-endorses-vision-of-greater-israel/; original at: https://www.i24news.tv/he/news/news/politics/artc-90402ef0_. See also, the Prime Minister’s reference to the Occupied Palestinian Territory as “a piece of Israel”, Prime Minister of Israel, @IsraeliPM, Tweet (14 August 2025), <https://x.com/IsraeliPM/status/1956040393142706556>.

²⁹³ Nathan Meshi and Avi Gedalovich, “Minister Eliyahu: ‘The government is racing ahead for Gaza to be wiped out – it will be Jewish’”, *Kol Barama Radio* (24 July 2025), <https://kol-barama.co.il/item/%d7%94%d7%a9%d7%a8-%d7%90%d7%9c%d7%99%d7%94%d7%95-%d7%94%d7%9e%d7%9e%d7%a9%d7%9c%d7%94-%d7%93%d7%95%d7%94%d7%a8%d7%aa-%d7%9c%d7%96%d7%94-%d7%a9%d7%a2%d7%96%d7%94-%d7%a0%d7%9e%d7%97%d7%a7%d7%aa/> [00:55-00:59, 05:06-05:39, 06:33-07:35].

cruelty twenty months ago. And we will defeat them! And wipe them out! They will not remain!”²⁹⁴

- On 26 May 2025, Israel’s Minister of Finance and Minister in the Ministry of Defence stated — at that same rally — “We are blessed, praise G-d, as was said here before, to expand the borders of Israel, in all areas and on all fronts. We are blessed to cut off the seed of Amalek, an effort which is growing stronger. We still have a long way to go in this regard, but it is much, much better than last year. We are truly blessed to greatly consolidate our hold on the Land of Israel.”²⁹⁵
- On 15 May 2025 (Nakba day), Minister of Agriculture and Rural Development, Security Cabinet Member and former Director of Israel’s internal Security Services, Avi Dichter (Security Cabinet member), addressed a message to “Gazans”, reminding them of the catastrophes of the Nakba and the Naksa, and stating that “Gaza has become Khirbet Gaza. And what awaits you is worse than what happened [in the past].”²⁹⁶ On 4 July 2025, an interview was published in which he stated that he had “. . . no doubts about the future of Gaza. ‘Gaza’s story is over, Gaza will not pose a threat to the State of Israel. Gaza will not be connected to Egypt, and Gazans will not enter Israel, not in this generation nor in the next one. Gaza is a finished story, no matter what the war looks like in conclusion. If it were not for the hostages, Gaza would have been finished long ago . . . There will be a massive exit out of Gaza. The Americans and the Europeans will get them out of there and rehabilitate them in Libya and in other places. It’s a matter of money, and they have money . . . I think when the war ends, this will be part of the war’s conclusion. When they open Gaza, the extent of Gazans who want to leave will astonish everyone. There is nothing that will prevent them from leaving.”²⁹⁷
- On 19 March 2025, Minister of Defence Israel Katz, threatened the population of Gaza with: “Citizens of Gaza, this is your final warning . . . Return the hostages and expel Hamas and other options will be presented to you, including relocating to other places in the world for those who wish. The alternative is utter destruction and devastation.”²⁹⁸
- On 15 August 2025 Minister of National Security Itamar Ben-Gvir posted a video of him talking to imprisoned former Palestinian legislator and political leader Marwan Barghouti (Fatah), in which he declared: “[Y]ou will not win. Anyone who messes with the people of Israel, anyone who murders our

²⁹⁴ “Prime Minister Netanyahu’s remarks at the Mercaz HaRav rally celebrating the unification of Jerusalem”, *Israeli PM* (27 May 2025), <https://youtu.be/LQTEZ2fpH2s?si=k21vg6f9hGy6P149>, [05:55-06:21].

²⁹⁵ “Minister Smotrich at Mercaz HaRav”, *Channel 7* (26 May 2025), <https://www.youtube.com/watch?v=ROpf7HxNL3w>, [0:09-0:38].

²⁹⁶ Minister of Agriculture and Rural Development, Avi Dichter, @avidichter, Tweet (7:15 am, 15 May 2025), <https://x.com/avidichter/status/1922883612480852352>, [0:26]. Khirbet (خربة) is a loan word from Arabic, noting a structure or building that is now in ruins.

²⁹⁷ Akiva Weiss, “Gaza will no longer be a threat to the State of Israel”, *Makor Rishon* (4 July 2025), <https://www.makorrishon.co.il/magazine/people/article/178992>.

²⁹⁸ Minister of Defence of Israel, Israel Katz, @Israel_katz, Tweet (5:54 pm, 19 March 2025), https://x.com/Israel_katz/status/1902388250053861589.

children, anyone who murders our women, we will eradicate them. You should know this, throughout all of history.”²⁹⁹

- On 5 March 2025, Deputy member of the Knesset Nissim Vaturi posted: “The moment when Gaza is wiped out [lit: erased] is getting closer”³⁰⁰. On 23 February 2025 he incited in a radio interview: “Who’s innocent in Gaza? People went out and slaughtered people in cold blood . . . [We] should separate women and children and kill the adults in Gaza, we are too considerate . . . no one in the world wants Gaza’s civilians, everyone is pushing them on Israel, they know these are scumbags and subhuman” further stating “[w]e will soon turn Jenin into Gaza as well”.³⁰¹
- On 25 April 2025, member of the Knesset and head of the Knesset’s Delegation for Relations with the European Parliament, Ariel Kallner, ‘tweeted’: “. . . [t]here is no substitute for occupying the land, controlling it, removing population away from it and cleansing it. This is what needs to be done in Beit Hanoun and what needs to be done everywhere in the Strip.”³⁰²

74. These statements of incitement to genocide have been met with complete impunity. Yet a journalist who published his reluctance to mourn the death of five Israeli soldiers was immediately arrested.³⁰³ Statements such as those of Deputy Head of the Knesset MK Nissim Vaturi calling to “burn Gaza”,³⁰⁴ and the Minister of Finance Bezalel Smotrich’s many inciting statements (which he argues represent “. . . decisions [that] are made on behalf of Israel, and the state stands behind them”³⁰⁵) were found by the ethics committee of the Knesset to not violate

²⁹⁹ Itamar Ben-Gvir, @bengvir, Telegram (9:12 am, 15 August 2025), <https://t.me/bengvir/5913>.

³⁰⁰ Image in original. Nissim Vaturi, Facebook (5 March 2025), <https://www.facebook.com/LikudV/posts/pfbid031XztFuKjYmTaUixqz4kxX9qNrST8X7REJ6a8oNd8WfigXSMhpYMtLsJXV2s9qgql>.

³⁰¹ “MK Nissim Vaturi of the Likud calls to separate the women and children and kill the adults in Gaza”, *Channel 7 News* (23 February 2025), <https://www.inn.co.il/news/662252>.

³⁰² MK Ariel Kallner, @ArielKallner, Tweet (8:37 am, 25 April 2025), <https://x.com/ArielKallner/status/1915656301176135895>.

³⁰³ Committee for the Protection of Journalists, *Israel arrests Israeli journalist over tweet, opens terrorism investigation* (10 July 2025), <https://cpj.org/2025/07/israel-arrests-israeli-journalist-over-tweet-opens-terrorism-investigation/>.

³⁰⁴ See e.g. UNSC, *Letter dated 27 February 2025 from the Permanent Representative of South Africa to the United Nations addressed to the President of the Security Council*, S/2025/130 (28 February 2025), <https://undocs.org/S/2025/130>, pp. 109-111, para. 31.

³⁰⁵ In response to the United Kingdom, Canada, Australia, New Zealand, and Norway sanctions imposed against the Minister “in response to their repeated incitements of violence against Palestinian communities”. Amichai Stein, “‘Allies don’t sanction allies’: Finance Minister Smotrich unfazed by UK sanctions - interview”, *The Jerusalem Post* (11 June 2025), <https://www.jpost.com/israel-news/politics-and-diplomacy/article-857379>. The United Kingdom, *UK and partners unite to sanction ministers inciting West Bank violence* (10 June 2025), <https://www.gov.uk/government/news/uk-and-partners-unite-to-sanction-ministers-inciting-west-bank-violence>. For prior statements of the Minister, see e.g. UNSC, *Letter dated 27 February 2025 from the Permanent Representative of South Africa to the United Nations addressed to the President of the Security Council*, S/2025/130 (28 February 2025), <https://undocs.org/S/2025/130>, pp. 81-87, para. 14.

any of its ethics rules, and the Attorney General Gali Baharav-Miara and State Prosecutor Amit Isman decided not to open criminal investigations.³⁰⁶

VIII. THE STEPS TO BE TAKEN BY THIRD STATES AND ISRAEL

75. In 1948 the drafters of the Genocide Convention declared that “[the] very purpose of the convention” was “to make what was simply optional for States into an imperative international obligation.”³⁰⁷ The imperative international obligation to prevent genocide — binding on all states under customary international law³⁰⁸ — does not depend on the Court or the Security Council, it “arise[s] at the instant that the State learns of, or should normally have learned of, the existence of a serious risk that genocide will be committed”.³⁰⁹ According to the Court: “From that moment onwards, if the State has available to it means likely to have a deterrent effect on those suspected of preparing genocide, or reasonably suspected of harbouring specific intent (*dolus specialis*), it is under a duty to make such use of these means as the circumstances permit”.³¹⁰

76. For eighteen months, States have been aware of the existence of a serious risk of genocide and under a duty to use all means reasonably available to prevent it. This serious risk has been confirmed by just about every United Nations body as well as numerous independent agencies. The International Court of Justice, the principal judicial organ of the United Nations, has gone further and detailed — within increasing specificity — the measures required to uphold the Genocide Convention and avoid yet another event that shocks the conscience of mankind. If States fail to take action in the face of these repeated warnings, they will not only risk violating an imperative international obligation and “the most elementary

³⁰⁶ Sivan Hilai, “Vatouri Called to ‘Burn Gaza,’ Ethics Committee Found No Violation”, *Ynet* (25 May 2025), <https://www.ynetnews.com/article/n99p1dt3x>; Chen Maanit, “Despite Calls to ‘Burn Gaza,’ Destroy Palestinian Cities, No Incitement Probe of Israeli Finance Minister, Likud MK”, *Haaretz* (4 May 2025), <https://www.haaretz.com/israel-news/2025-05-04/ty-article/.premium/despite-calls-to-burn-gaza-destroy-palestinian-cities-no-probe-of-top-minister-mk/00000196-9bd0-df59-abde-fbf83fd0000>.

³⁰⁷ United Nations Economic and Social Council, Ad Hoc Committee on Genocide: Relations Between the Convention on Genocide on the one hand and the Formulation of the Nürnberg Principles and the Preparation of a Draft Code of Offences Against Peace and Security on the other: Note by the Secretariat, UN Doc E/AC.25/3 (2 April 1948), <https://digitallibrary.un.org/record/601331?v=pdf>, p 8.

³⁰⁸ *Reservations to the Convention on the Prevention and Punishment of the Crime of Genocide, Advisory Opinion, I.C.J. Reports 1951* (‘Reservations to the Genocide Convention’), p 23; *Armed Activities on the Territory of the Congo (New Application: 2002) (Democratic Republic of the Congo v. Rwanda)*, *Jurisdiction and Admissibility, Judgment, I.C.J. Reports 2006*, p. 29, para. 64; and *Mugesera v. Canada* (Minister of Citizenship and Immigration), [2005] 2 SCR 100 (hereafter *Mugesera Judgment*), para 82.

³⁰⁹ *Application of the Convention on the Prevention and Punishment of the Crime of Genocide (Bosnia and Herzegovina. v. Serbia and Montenegro)*, *Judgment, I.C.J. Reports 2007* (‘Bosnia v. Serbia’), p. 222, para. 431.

³¹⁰ *Bosnia v. Serbia, Judgment, I.C.J. Reports 2007*, p. 222, para. 431.

principles of morality”³¹¹, they will have undermined the very purpose of the Genocide Convention.

77. As Parties to the ICJ Statute, States should not remain inactive in wilful disregard of the Court’s binding Orders, particularly in cases concerning the Genocide Convention “where no reparation could efface the results of conduct” in question.³¹² Since its very first order of Provisional Measures, the Court has held that its jurisdiction to do so is “entirely different” from “the jurisdiction of the Court to deal with and decide a case on the merits [which] depends on the will of the Parties”.³¹³ It arises from the inherent power of the Court to ensure the effectiveness of its Orders, which State parties to the ICJ Statute are “objectively” bound to respect.³¹⁴ In this regard, the most recent Order of 24 May 2024 did not only reaffirm the previous two Orders, it directed that these “be immediately and effectively implemented”, and did not limit this direction to the State of Israel.³¹⁵ It is incumbent upon all States to work towards ensuring the realisation of the Court’s Orders.

³¹¹ *Reservations to the Convention on the Prevention and Punishment of the Crime of Genocide, Advisory Opinion*, I.C.J. Reports 1951, p. 23.

³¹² *Bosnia v. Serbia, Provisional Measures, Order of 13 September 1993*, I.C.J. Reports 1993, p. 349, para. 58.

³¹³ *Anglo Iranian Oil Co. (UK v Iran) Preliminary Objections*, ICJ Reports, 1952, 93, 102-103. See further *Application of the International Convention on the Elimination of All Forms of Racial Discrimination (Qatar v. United Arab Emirates), Provisional Measures, Order of 14 June 2019, Separate Opinion of Judge Abraham*, I.C.J. Reports 2019, p. 379, para. 9 (noting: “The Court’s jurisdiction to entertain a request for provisional measures, for its part, does not derive from the jurisdictional basis invoked in the proceedings on the merits... This basis of jurisdiction is entirely independent of that relied on, by the applicant or by both parties, in the context of the principal proceedings”); and A Zimmerman & K Oellers-Frahm, ‘Article 41’ in Zimmerman et al (eds), *The Statute of the International Court of Justice: A Commentary* (3rd ed, Oxford University Press, 2018), para. 107 (noting “the distinction between jurisdiction in relation to provisional measures which is based on Article 41 of the Statute, and jurisdiction over the merits of the dispute, which is based on the consent of the parties, namely Article 36, para. 1 or para. 2 of the Statute”).

³¹⁴ Malcolm N. Shaw, “Jurisdiction over Incidental Matters”, *Rosenne’s Law and Practice of the International Court: 1920-2015* (2017) (noting that “the incidental jurisdiction of the Court rests only indirectly upon the consent of the parties (through their being parties to the Statute), that is to say, has an objective characteristic, also enables it to be regarded as an inherent jurisdiction, even when the Statute contains specific provisions for it”).

³¹⁵ *South Africa v. Israel*, Order of 24 May 2024, p. 14, para. 57(1).