

INTERNATIONAL COURT OF JUSTICE

**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
(Request for an Advisory Opinion)**

**WRITTEN REPLY OF THE KINGDOM OF SAUDI ARABIA TO THE QUESTIONS PUT
BY VICE-PRESIDENT SEBUTINDE ON 2 MAY 2025**

7 MAY 2025

I. QUESTIONS PUT BY VICE-PRESIDENT SEBUTINDE

Which third States and other international organizations operate to provide basic services and humanitarian and developmental assistance in the Occupied Palestinian Territory? To what extent have restrictions, if any, been placed upon their operations in the Occupied Palestinian Territory by Israel since 2 March 2025?

1. The Kingdom of Saudi Arabia recalls that itself and several participants in these proceedings have referred to other international organizations and third States that operate to provide humanitarian and development assistance to the Palestinian people throughout the Occupied Palestinian Territory, highlighting multiple instances where Israel has prevented these organizations and third States from carrying out their work.¹

2. The Kingdom of Saudi Arabia is one of the States that has provided humanitarian and development assistance over the years to the Palestinian people in the Occupied Palestinian Territory as part of its longstanding commitment to the exercise by the Palestinian people of their right of self-determination and its relentless efforts in support of the establishment of an independent Palestinian State based on the 1967 borders with East Jerusalem as its capital.²

3. In answering the first question posed by Vice-President Sebutinde, the Kingdom of Saudi Arabia also provides herein a non-exhaustive list of other third States and international organizations that operate to provide humanitarian and development assistance to the Palestinian people throughout the Occupied Palestinian Territory, along with illustrative examples where Israel has hindered the provision of such desperately needed assistance by those entities.

¹ See, e.g., Written Statement of the Kingdom of Saudi Arabia, 28 February 2025, para. 12, n. 31; Written Statement of the State of Palestine, 28 February 2025, paras. 2.34-2.35, 2.57; Written Statement of the Arab Republic of Egypt, 28 February 2025, paras. 173-175; Written Statement of the League of Arab States, 28 February 2025, paras. 65-66, 86, 91-97; Written Statement of the State of Qatar, 28 February 2025, para. 89; Written Statement of Mexico, 4 March 2025, para. 43.

² See, e.g., “Saudi Arabia Announces a Monthly Financial Grant to Alleviate the Palestinian Humanitarian Crisis in Gaza”, *Saudi Press Agency*, 29 September 2024, available at: <https://www.spa.gov.sa/en/N2179888>.

4. The Organisation of Islamic Cooperation,³ the International Committee of the Red Cross and the Palestinian Red Crescent Society,⁴ and the European Union⁵ have provided humanitarian and development assistance to the Palestinian people in the Occupied Palestinian Territory.

5. The Arab Republic of Egypt has offered detailed evidence that itself and other third parties, including other States and international financial institutions, have provided essential humanitarian and development assistance for the benefit of the Palestinian population.⁶ The information provided by Egypt relied, amongst others, on data by the Palestinian Economic Council for Development and Reconstruction.⁷ The Hashemite Kingdom of Jordan has also offered evidence of its efforts to provide the urgently needed essential medical and humanitarian

³ Written Statement of the State of Palestine, 28 February 2025, para. 2.57.

⁴ *See, e.g.*, Written Statement of the State of Palestine, 28 February 2025, para. 2.57; Written Statement of the Republic of South Africa, 28 February 2025, para. 185; Written Statement of the State of Qatar, 28 February 2025, para. 89. *See also* “Israel and the occupied territories: After two months of aid blockage, humanitarian response in Gaza on verge of total collapse”, ICRC, 2 May 2025, available at: <https://www.icrc.org/en/news-release/israel-and-occupied-territories-after-two-months-aid-blockage-humanitarian-response-verge-collapse>.

⁵ *See, e.g.*, European Civil Protection and Humanitarian Aid Operations, “EU Humanitarian efforts in Gaza: a lifeline amidst destruction”, 14 April 2025, available at: https://civil-protection-humanitarian-aid.ec.europa.eu/news-stories/stories/eu-humanitarian-efforts-gaza-lifeline-amidst-destruction_en; European Civil Protection and Humanitarian Aid Operations, “Palestine”, 28 January 2025, available at: https://civil-protection-humanitarian-aid.ec.europa.eu/where/middle-east-and-northern-africa/palestine_en#how-are-we-helping; European Council, Council of the European Union, “EU humanitarian support for Palestinians”, 1 April 2025, available at: <https://www.consilium.europa.eu/en/policies/eu-humanitarian-support-to-palestinians/>. *See also* Written Statement of the League of Arab States, 28 February 2025, paras. 86, 96, n. 149.

⁶ Written Statement of the Arab Republic of Egypt, 28 February 2025, paras. 173-175 and Annex I; Oral Statement of the Arab Republic of Egypt, CR 2025/4, pp. 40-41, paras. 17-20 (Moussa). *See also* Written Statement of the League of Arab States, 28 February 2025, paras. 91-95.

⁷ Palestine Economy Portal, available at: <https://www.palestineconomy.ps/donors/en>.

supplies to the people residing in the Gaza Strip.⁸ Qatar⁹ and Tunisia¹⁰ are amongst other third States that have provided humanitarian assistance in Gaza.

6. Several instances of Israel's attacks and obstruction of humanitarian and development assistance by other international organizations and third States have been highlighted in these proceedings. Some of these include:

- i. Israel has prevented the provision of assistance by organizations such as the European Union and the International Committee of the Red Cross.¹¹
- ii. In January 2024 Israel bombed and destroyed the offices of the Belgian development agency located in the Gaza Strip which provided relevant developmental assistance to the population.¹²
- iii. Israel failed to protect humanitarian aid convoys sent into the Occupied Palestinian Territory by third States such as Jordan when, in May 2024,

⁸ Written Statement of the Hashemite Kingdom of Jordan, 28 February 2025, paras. 1.75-1.77. The Hashemite Kingdom of Jordan stated that as of 27 January 2025, it had sent "147 aid convoys to Gaza, via the Jordan route, with a total of 5,569 trucks carrying more than 66,000 tons of aid, valued at \$171.5 million. These convoys have delivered food, medical supplies, sanitary products, blankets, and tents, benefiting more than 1.3 million people, residing in the Strip." *Id.*, para. 1.75.

⁹ Ministry of Foreign Affairs, "Qatar Launches Air Bridge from Jordan to Deliver Medical Supplies to Gaza, Press Release", 3 February 2025, available at: <https://mofa.gov.qa/en/qatar/latest-articles/latest-news/details/2025/02/03/qatar-launches-air-bridge-from-jordan-to-deliver-medical-supplies-to-gaza>.

¹⁰ "Tunisia sends 14 tons of humanitarian aid to Gaza", 27 June 2024, available at: <https://english.news.cn/20240627/c93b68dacee342e3ace2854ba308a921/c.html>.

¹¹ See, e.g., Written Statement of the State of Palestine, 28 February 2025, para. 2.59; Written Statement of the League of Arab States, 28 February 2025, para. 66; Written Statement of the African Union, 10 March 2025, para. 46; "Israel and the occupied territories: After two months of aid blockage, humanitarian response in Gaza on verge of total collapse", ICRC, 2 May 2025, available at: <https://www.icrc.org/en/news-release/israel-and-occupied-territories-after-two-months-aid-blockage-humanitarian-response-verge-collapse>.

¹² "Belgium summons Israeli envoy to protest bombing of development agency in Gaza", *Times of Israel*, 2 February 2024, available at: <https://www.timesofisrael.com/belgium-summons-israeli-envoy-to-protest-bombing-of-development-agency-in-gaza/>. See also Written Statement of the State of Palestine, 28 February 2025, para. 2.67.

Israel settlers attacked a Jordanian humanitarian aid convoy delivering food and other aid to the Gaza Strip.¹³

- iv. In May 2024 Israel stopped the Spanish Consulate General in East Jerusalem from providing services to the Palestinian civilian population in the Occupied Palestinian Territory shortly after Spain's recognition of the State of Palestine.¹⁴
- v. In August 2024 Norway's representative office to the State of Palestine in the Occupied Palestinian Territory had to be closed following Israel's revocation of the accreditation of Norwegian diplomats after Norway recognized Palestine as a State.¹⁵
- vi. On 30 August 2024, Israel bombed a humanitarian truck bound for the Emirati hospital in Rafah, killing several aid workers and therefore preventing the provision of aid by such humanitarian institution.¹⁶

7. In sum, there is abundant evidence that Israel has prevented, obstructed and interfered with the provision of humanitarian and development assistance by other international organizations and third States in the Occupied Palestinian Territory. This is in addition to the outright obstruction by Israel of humanitarian and development assistance provided by the United

¹³ "Jordan says Israeli settlers attacked Jordanian aid convoys on way to Gaza", *Reuters*, 1 May 2024, available at: <https://www.reuters.com/world/middle-east/jordan-says-israeli-settlers-attacked-jordanian-aid-convoys-way-gaza-2024-05-01/>.

¹⁴ "Israel stops Spanish consulate from providing services to Palestinians", *Reuters*, 24 May 2024, available at: <https://www.reuters.com/world/middle-east/israel-stops-spanish-consulate-providing-services-palestinians-2024-05-24/>. See also Written Statement of the Hashemite Kingdom of Jordan, 28 February 2025, para. 1.46; Written Statement of the African Union, 10 March 2025, para. 46.

¹⁵ Ministry of Foreign Affairs of Norway, "Norway's Representative Office in Palestine is closed until further notice", Press Release, 16 August 2024, available at: <https://www.regjeringen.no/en/aktuelt/norways-representative-office-in-palestine-is-closed-until-further-notice/id3050105/>. See also Written Statement of the State of Palestine, 28 February 2025, para. 2.67; Written Statement of the Hashemite Kingdom of Jordan, 28 February 2025, para. 1.46; Written Statement of the League of Arab States, 28 February 2025, para. 63; Written Statement of the African Union, 10 March 2025, para. 46.

¹⁶ Human Rights Council, *Report of the Special Rapporteur on the Situation of human rights in the Palestinian territories occupied since 1967*, U.N. Doc. A/79/384, 1 October 2024, p. 8, para. 18 (U.N. Dossier No. N257).

Nations, its agencies and bodies, including UNRWA, whose role in assisting the Palestinian population is of utmost importance and cannot be replaced.¹⁷ As the Kingdom of Saudi Arabia and several participants in these proceedings have asserted, these measures amount to collective punishment, prohibited under international humanitarian law.¹⁸

8. As to the second question posed by Vice-President Sebutinde, in so far as Israel has reinstated a complete blockade since 2 March 2025, all humanitarian and development aid, irrespective of its provider, has been halted and cannot enter the Gaza Strip.¹⁹ The Kingdom of Saudi Arabia and numerous other participants in these proceedings have emphasized the distressing and appalling situation faced by the Palestinian people in the Gaza Strip caused by the total blockade imposed by Israel.²⁰ This is yet another example of Israel's strategy of using starvation as a weapon of war in furtherance of its policy of ethnic cleansing and preventing the exercise of the Palestinian people's right to self-determination.²¹

9. Since 2 March 2025, several restrictions have also been placed on operations of other international organizations in other parts of the Occupied Palestinian Territory, including the West Bank and East Jerusalem. The intensification of military operations in the occupied West

¹⁷ Written Statement of the Kingdom of Saudi Arabia, 28 February 2025, paras. 12-25; Oral Statement of the Kingdom of Saudi Arabia, CR 2025/5, pp. 36, 39-40, paras. 4-6, 14-17 (Alnasser). *See also* Letter from the United Nations Secretary-General to the General Assembly, U.N. Doc. A/79/558, 28 October 2024, p. 3 (U.N. Dossier No. N65).

¹⁸ *See, e.g.*, Written Statement of the Kingdom of Saudi Arabia, 28 February 2025, para. 39; Oral Statement of the Kingdom of Saudi Arabia, CR 2025/5, p. 43, para. 28 (Alnasser); Oral Statement of the Arab Republic of Egypt, CR 2025/4, p. 38, para. 3 (Moussa); Oral Statement of the Republic of Indonesia, CR 2025/7, p. 49, paras. 53-55 (Sugiono); Oral Statement of the Republic of Türkiye, CR 2025/8, pp. 9, 13, paras. 11, 34-35 (Yilmaz); Oral Statement of the State of Kuwait, CR 2025/8, p. 50, para. 35 (Al-Shaheen); Oral Statement of Mexico, CR 2025/9, p. 30, para. 26 (Arrocha); Oral Statement of the State of Qatar, 2025/10, p. 43, para. 16 (Al-Qahtani).

¹⁹ *See, e.g.*, "Gazans face hunger crisis as aid blockade nears two months", *UN*, 28 April 2025, available at: <https://news.un.org/en/story/2025/04/1162666>; "Gaza kitchens warn food will run out in days after two months of Israeli blockade", *BBC*, 2 May 2025, available at: <https://www.bbc.com/news/articles/cx2vz02e7g8o>.

²⁰ *See, e.g.*, Oral Statement of the Kingdom of Saudi Arabia, CR 2025/5, p. 36, paras. 4-6 (Alnasser). *See also* Oral Statement of the State of Palestine, CR 2025/3, pp. 58-61, paras. 32-45 (Hijazi); *id.*, p. 76, para. 6; Oral Statement of the Arab Republic of Egypt, CR 2025/4, p. 29, para. 2 (Abdelkader); *id.*, pp. 38, 41, paras. 4, 20 (Moussa); Oral Statement of South Africa, CR 2025/5, pp. 8-9, paras. 2-6 (Dangor); Oral Statement of the Republic of Türkiye, CR 2025/8, p. 16, para. 54 (Yilmaz); Oral Statement of the State of Kuwait, CR 2025/8, p. 49, para. 35 (Al-Shaheen).

²¹ Written Statement of the Kingdom of Saudi Arabia, 28 February 2025, para. 81; Oral Statement of the Kingdom of Saudi Arabia, CR 2025/5, p. 36, paras. 4-6 (Alnasser).

Bank, increased settlers' violence, and movement restrictions have severely disrupted the provision of humanitarian aid to the Palestinian population.²²

²² See, e.g., Written Statement of the State of Palestine, 28 February 2025, paras. 1.25, 2.30, 2.61, 3.26, 4.77, 5.45; Oral Statement of the State of Palestine, CR 2025/3, p. 61, paras. 46-48 (Hijazi); *id.*, pp. 71-72, paras. 37-38 (Reichler); "Aid groups struggle to provide for thousands displaced in West Bank", *The Washington Post*, 30 March 2025; available at: <https://www.washingtonpost.com/world/2025/03/30/israel-west-bank-displacement-crisis/>; "Tragedy foretold and stain on our collective humanity': Special Rapporteur warns of mass ethnic cleansing in the West Bank", United Nations Office of the High Commissioner for Human Rights, 18 March 2025, available at: <https://www.ohchr.org/en/press-releases/2025/03/tragedy-foretold-and-stain-our-collective-humanity-special-rapporteur-warns>.