

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

**SOUTH AFRICA'S WRITTEN REPLY
TO THE QUESTION POSED BY JUDGE SEBUTINDE AT THE END OF THE ORAL HEARINGS HELD FROM 28 APRIL – 2 MAY 2025**

I. INTRODUCTION

1. On 2 May 2025, oral hearings were concluded on the urgent Advisory Opinion requested by the General Assembly pursuant to resolution 279/232 regarding the *Obligations of Israel in relation to the presence and activities of the United Nations, other international organizations and third States in and in relation to the Occupied Palestinian Territory*. At the conclusion of the oral hearings, Judge Sebutinde addressed a question to third States and International Organizations in the following terms:

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

2. Participants in the oral proceedings were invited to submit any comments they may wish to make in response to the question posed by Judge Sebutinde by 18:00 pm on Wednesday, 07 May 2025. South Africa submits these comments in accordance with that invitation.

II. STRUCTURE AND OVERVIEW

A. Structure

3. Given the urgent basis upon which the present request is before the Court, and in view of the number of written replies the Court may receive on the question from third States and International Organisations, South Africa limits its reply to three aspects relevant to the question posed by Judge Sebutinde and attempts to do so as briefly as possible. South Africa's assistance to the people of Palestine is effected in two ways, namely, (a) voluntary contributions to the United Nations Relief Works Agency for Palestine Refugees (UNRWA), and (b) a South African non-governmental organisation, the Gift of the Givers, which has been operating in Gaza since 2008. In addition, South Africa notes reports since the conclusion of the oral proceedings, that Israel intends to create militarised humanitarian hubs and on its planned “conquering of Gaza and holding territories”.¹

4. South Africa's comments are structured as follows: following the above introduction (**Section One**), and this overview (**Section Two**), **Section Three** deals with the attempts by South Africa to render humanitarian assistance through UNRWA and a South African non-governmental organisation, Gift of the

¹ *The Times of Israel*, "Cabinet-approved plans include 'conquering Gaza and holding territories,' official says", 5 May 2025, https://www.timesofisrael.com/liveblog_entry/cabinet-approved-plans-include-conquering-gaza-and-holding-territories-official-says/.

Givers. **Section Four** describes Israel’s planned alternative for the delivery of humanitarian aid to Gaza. **Section Five** concludes South Africa’s written reply.

5. Annexed to South Africa’s comments is a report by the Gift of the Givers which provides further context to the challenges it has faced since 2 March 2025 (‘Annexure A’).

B. Overview

6. South Africa notes the temporal scope of the question to restrictions faced by third States since 2 March 2025. However, South Africa takes the opportunity to briefly set out important events leading to the siege and humanitarian blockade imposed by Israel since 2 March 2025. South Africa has since its *Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (South Africa v. Israel)* warned of Israel’s pattern of denying humanitarian aid to Palestinians in Gaza and the associated policy of starvation of that group since the start of its military campaign on the Gaza Strip.

7. Israel has systematically denied lifesaving aid and basic services to Palestinians in Gaza, and is deliberately starving a vulnerable population, inflicting measures of ‘slow death’. Since 7 October 2023, Israel has gone a step further and implemented a policy of *denial* of humanitarian aid affecting an already weakened population with full knowledge of the consequences of doing so and with the specific intent to destroy the population.

8. South Africa strongly condemns Israel’s bombing by drones of the flotilla ship, The Conscience, on 2 May 2025, which attempted to deliver food and medical supplies to the besieged population in Gaza. This unlawful act occurred in international waters on the day of the conclusion of the Court’s oral proceedings on the very question of Israel’s obligations as an Occupying Power to ensure and facilitate the passage of humanitarian aid to Palestine. This latest addition to its deluge of internationally wrongful acts demonstrates Israel’s indifference to the plight of over 2 million Palestinians, and for international law.

9. As the below indicates, between 19 January and 2 March 2025, Israel demonstrated - once again - that it has the capacity to rapidly increase the entry of aid - should it *choose* to. However, its failure to do so consistently, leaves no other reasonable inference but that it intends to create and maintain genocidal conditions of life of Palestinians in Gaza and that it is deliberately starving the Palestinian population as a method of warfare, in contravention of international humanitarian law.

10. On 16 January 2025, Israel and Hamas reached a multi-phase ceasefire deal mediated by Qatar, Egypt, and the United States, which was announced on January 15, 2025.² The Israeli Security Cabinet ratified the agreement on January 17, 2025.³ The ceasefire officially commenced on January 19, 2025. This enabled “a surge” in the flow of humanitarian aid into Gaza for 42 days in response to critical humanitarian needs in Gaza.⁴ The first phase of the ceasefire collapsed following Israel’s blockade of all humanitarian aid into Gaza on 2 March 2025. Israel immediately closed the Kerem Shalom, Zikim and Erez crossings for cargo entering Gaza. The United Nations Office for the Coordination of Humanitarian Affairs (OCHA)

² Al Jazeera, “Israel and Hamas reach Gaza ceasefire deal, what are the next steps?”, 16 January 2025,

<https://www.aljazeera.com/news/2025/1/16/israel-and-hamas-reach-gaza-ceasefire-deal-what-are-the-next-steps>.

³ New York Post, “Israel’s full cabinet approves long-awaited cease-fire deal with Hamas, allowing hostages to be released,” 17 January 2025, <https://nypost.com/2025/01/17/world-news/israeli-security-cabinet-approves-long-awaited-cease-fire-deal-with-hamas/>.

⁴ United Nations Office for the Coordination of Humanitarian Affairs (OCHA), *Humanitarian Situation Update #257 | Gaza Strip*, 22 January 2025, <https://www.ochaopt.org/content/humanitarian-situation-update-257-gaza-strip>.

reported that the Israeli authorities had rejected United Nations attempts to collect humanitarian supplies that had already passed over the Kerem Shalom crossing before the closure.⁵

11. The ceasefire effectively ended on 18 March 2025 when the Israeli Defense Forces (IDF) “resumed combat in full force”⁶ by launching extensive airstrikes across Gaza. Israeli Prime Minister Benjamin Netanyahu stated that the strikes were ordered due to Hamas' rejection of proposals to extend the ceasefire and release hostages.⁷ Over 400 Palestinians were killed on the same day.⁸

12. During the first phase of the ceasefire agreement, humanitarian agencies were granted increased access to Gaza, leading to a significant but time-bound improvement in the delivery of life-saving assistance to the people of Gaza. Central to the ceasefire agreement was Israel's obligation to permit the entry of 600 aid trucks daily, including 50 fuel trucks, to address acute shortages of food, water, and medical supplies.⁹ The agreement further required Israel to withdraw military forces from population centres, enabling humanitarian agencies to operate without undue interference.¹⁰

13. Approximately 42,000 trucks of humanitarian goods entered Gaza during the first phase. According to OCHA “[t]his included goods coordinated by the UN as well as goods donated bilaterally.”¹¹ UN-coordinated fuel deliveries were prioritised for hospitals, water desalination plants, and bakeries. While this marked a significant improvement from pre-ceasefire levels, Israel maintained arbitrary restrictions on materials deemed “dual-use,” including cement, solar panels, and heavy machinery, directly hindering reconstruction efforts.¹²

14. Humanitarian organisations distributed 78,000 metric tonnes of food to approximately 2 million people, with daily cooked meal distributions increasing by 35 percent (860,000 meals prepared across 180 community kitchens).¹³ Bakeries quintupled bread production to 150,000 bundles daily, though reliance on burning wooden pallets due to cooking gas shortages persisted. Over 171,000 metric tonnes of food were pre-positioned for sustained aid, but Israeli restrictions imposed after 2 March 2025 blocked its delivery.¹⁴

15. Critical infrastructure repairs were obstructed by Israel's refusal to permit cement, engineering equipment, and solar panels. For example, the Mekerot Bani Sa'id water line, capable of supplying 10,000 cubic metres of drinking water daily, remained inoperable. Buffer zones near the Israeli perimeter fence

⁵ United Nations, *Daily Press Briefing by the Office of the Spokesperson for the Secretary-General*, 4 March 2025, available at: <https://press.un.org/en/2025/db250304.doc.htm> (accessed 6 May 2025).

⁶ BBC News, *Netanyahu calls strikes on Gaza 'only the beginning' as hundreds reported killed*

19 March 2025, available at: <https://www.bbc.com/news/articles/cwvq28wd1k3o> (accessed 6 May 2025).

⁷ Reuters, *Israel warns more to come as airstrikes kill over 400 in Gaza after two months of truce*, 18 March 2025, available at: <https://www.reuters.com/world/middle-east/israeli-military-conducts-strikes-hamas-targets-gaza-army-says-2025-03-18> (accessed 6 May 2025).

⁸ Ibid.

⁹ United Nations Office for the Coordination of Humanitarian Affairs (OCHA) – Occupied Palestinian Territory, “*Report: Humanitarian response by the UN and humanitarian partners during phase one of the ceasefire*,” 17 March 2025, <https://www.ochaopt.org/content/report-humanitarian-response-un-and-humanitarian-partners-during-phase-one-ceasefire>

¹⁰ *The Times of Israel*, “Text of the hostage-ceasefire agreement reached between Israel and Hamas,” 16 January 2025, available at: <https://www.timesofisrael.com/full-text-of-the-hostage-ceasefire-agreement-reached-between-israel-and-hamas/> (accessed 6 May 2025).

¹¹ Ibid.

¹² United Nations Office for the Coordination of Humanitarian Affairs (OCHA), *Gaza Humanitarian Response Update: 2–15 February 2025*, 15 February 2025, available at: <https://www.ochaopt.org/content/gaza-humanitarian-response-update-2-15-february-2025> (accessed 6 May 2025).

¹³ United Nations Office for the Coordination of Humanitarian Affairs (OCHA), *Gaza Humanitarian Response Update, 16 February – 1 March 2025*, <https://www.ochaopt.org/content/gaza-humanitarian-response-update-16-february-1-march-2025>.

¹⁴ Ibid.

further restricted access to landfills and sewage systems, leaving 260,000 tonnes of waste unprocessed and exacerbating public health risks.¹⁵

16. On 2 March 2025, Israeli Prime Minister Benjamin Netanyahu announced that, “Israel has decided to stop letting goods and supplies into Gaza, something we’ve done for the past 42 days. We’ve done that because Hamas steals the supplies and prevents the people of Gaza from getting them. It uses these supplies to finance its terror machine, which is aimed directly at Israel and our civilians – and this we cannot accept”.¹⁶

17. Since 2 March 2025, Israel has imposed a complete blockade on all humanitarian supplies, basic necessities and aid from entering the Occupied Palestinian Territory. Israeli officials have stated that there is still sufficient food in Gaza, although the head of Israel’s military has cautioned political leaders that supplies must be allowed to enter soon.¹⁷ For instance, Israeli authorities have expressed that the 650 aid trucks per day allowed into Gaza during the six-week truce were sufficient to feed the population for an extended period, and that Hamas diverted much of the aid that entered during this period.¹⁸

18. However, this contrasts strongly with reports from international organisations. For example, UNRWA reported on 1 May 2025 that, “critical humanitarian supplies, including food, fuel, medical aid and vaccines for children, are rapidly depleting; UNRWA flour and food parcels have run out and around one third of essential medical supplies are already out of stock. This is having a devastating impact on the population, particularly on vulnerable groups including children, women and the elderly”.¹⁹

19. On 25 April 2025, the World Food Programme (WFP) reported that its food supplies in the Gaza Strip had been completely exhausted due to Israel’s ongoing blockade, which had lasted nearly eight weeks. The blockade had effectively halted the flow of essential humanitarian aid, cutting off a critical source of sustenance for hundreds of thousands of Palestinians in the territory.²⁰ The WFP distributed its remaining food stocks to local community kitchens, but those supplies have since run out, effectively shuttering WFP’s programmes.

20. Israeli politicians, including Ministers on the Security Cabinet, have continued to call for the denial of humanitarian aid into Gaza. As recent as 5 May 2025, Israeli MK Tally Gotliv stated on X, “not even a crumb or grain must be brought into Gaza. Starving the enemy who holds our captives is the only way to subdue the enemy and bring about the return of all our captives”.²¹ Minister of National Security, Ben Gvir stated on X, “No deal, no ceasefire, no aid - just continued fighting until the Nazis are defeated in Gaza. Increase the pressure, exert all the power and might – until Hamas begs on its knees. Until complete

¹⁵ United Nations Office for the Coordination of Humanitarian Affairs (OCHA), *Humanitarian Situation Update #261 | Gaza Strip*, 3 February 2025, available at: <https://www.ochaopt.org/content/humanitarian-situation-update-261-gaza-strip> (accessed 6 May 2025).

¹⁶ Benjamin Netanyahu, “Statement by Prime Minister Benjamin Netanyahu,” *Israel Government Press Office*, 2 March 2025, <https://www.gov.il/en/pages/statement-by-pm-netanyahu-2-mar-2025> (accessed 6 May 2025).

¹⁷ CBS News. (2025, May 5). *Israel plans to capture entire Gaza Strip, officials say, as tens of thousands of reservists called up*. CBS News. <https://www.cbsnews.com/news/israel-gaza-war-hamas-offensive-expanding-expel-palestinians/> (accessed 6 May 2025).

¹⁸ The Times of Israel, *UN Humanitarian Agency Rejects New Israeli Plan for Gaza Aid Deliveries*, 5 May 2025, available at: <https://www.timesofisrael.com/un-humanitarian-agency-rejects-new-israeli-plan-for-gaza-aid-deliveries/> (accessed 6 May 2025).

¹⁹ United Nations Relief and Works Agency for Palestine Refugees in the Near East (UNRWA), *UNRWA Situation Report #169 on the Humanitarian Crisis in the Gaza Strip and the West Bank, including East Jerusalem*, 1 May 2025, available at: <https://www.unrwa.org/resources/reports/unrwa-situation-report-169-situation-gaza-strip-and-west-bank-including-east-jerusalem> (accessed 6 May 2025). f

²⁰ United Nations World Food Programme (WFP), “WFP runs out of food stocks in Gaza as border crossings remain closed,” 25 April 2025, <https://www.wfp.org/news/wfp-runs-out-food-stocks-gaza-border-crossings-remain-closed>.

²¹ Tally Gotliv, Tweet (12:22 pm, 5 May 2025), <https://x.com/TallyGotliv/status/1919352064548716656>

victory”.²² According to Defence Minister, Israel Katz, “Israel’s policy is clear: no humanitarian aid will enter Gaza, and blocking this aid is one of the main pressure levers preventing Hamas from using it as a tool with the population.”²³

21. On 2 May 2025, the International Committee for the Red Cross (ICRC) issued a statement under the title, “Israel and the occupied territories: After two months of aid blockage, humanitarian response in Gaza on verge of total collapse”, highlighting that “[w]ithout an immediate resumption of aid deliveries, the [ICRC] will not have access to the food, medicines, and life-saving supplies needed to sustain many of its programmes in Gaza”.²⁴ The ICRC is further raising the alarm, that the “Red Cross Field Hospital in Gaza is also running dangerously low on food and medical supplies, with some essential medicines and consumables already exhausted. Hospitals and other medical facilities are reorganizing stocks and prioritising supplies to be able to continue lifesaving activities. Without urgent replenishment, hospitals will struggle to continue providing much-needed medical care to patients”.²⁵

III. HUMANITARIAN ASSISTANCE BY SOUTH AFRICA AFFECTED BY THE ISRAELI RESTRICTIONS

A. UNRWA

22. Through its humanitarian assistance programme, South Africa makes a dedicated annual contribution to UNRWA. South Africa is in the process of allocating USD 2.75 million (50 million South African Rands) for UNRWA’s critical and life-saving work in Gaza.²⁶

23. South Africa is gravely concerned that UNRWA would be unable to utilise the funds, including those from other States, to deliver desperately needed humanitarian aid to Palestinians following the 2 March blockade imposed by Israel. The Israeli ban on UNRWA operating in the occupied East Jerusalem, is a further impediment to delivering assistance.²⁷

24. These actions affects South Africa's ability, and that of other States, to provide humanitarian assistance, as it relies on the agency's infrastructure, expertise and ability to provide assistance. Without UNRWA's established networks and logistical capabilities, alternative mechanisms for aid delivery will inevitably be less effective, leading to reduced reach and dire impact of humanitarian efforts which Palestinians can ill-afford.

25. As at 22 April 2025, humanitarian supplies remained stockpiled at the Egyptian border, including nearly 3,000 trucks of life-saving aid from UNRWA, which Israeli authorities refused to allow in. This aid

²² Ben Gvir, @itamarbengvir, Tweet (9:11 pm, 17 April 2025), <https://x.com/itamarbengvir/status/1912962228766023839>

²³ “No plans to allow any aid into Gaza, says Israeli minister”, *The Guardian* (17 April 2025), https://www.theguardian.com/world/2025/apr/16/no-humanitarian-aid-gaza-israeli-minister-israel-katz-amas?CMP=Share_iOSApp_Other; See also, @Israel_katz, Tweet (8:28 am, 16 April 2025), https://x.com/Israel_katz/status/1912407758869057781

²⁴ International Committee of the Red Cross (ICRC), “Israel and the occupied territories: ICRC warns of worsening humanitarian crisis in Gaza,” 02 May 2025, <https://www.icrc.org/en/news-release/israel-and-occupied-territories-after-two-months-aid-blockage-humanitarian-response-verge-collapse>

²⁵ Ibid.

²⁶ “South Africa pledges \$2.7m in humanitarian aid to Gaza,” 12 June 2024, <https://www.middleeastmonitor.com/20240612-south-africa-pledges-2-7m-in-humanitarian-aid-to-gaza/>.

²⁷ Knesset News, ‘Approved in final readings: Bill banning state authorities from maintaining any contact with UNRWA or a representative of the agency’ (*The Knesset*, 29 October 2024) <https://main.knesset.gov.il/en/news/pressreleases/pages/press291024w.aspx>

represents the collective relief schemes by third States, including South Africa, and constitutes the international community's humanitarian assistance to the Palestinian people.

B. Gift of the Givers

26. The South African non-governmental organisation, the Gift of the Givers, has been operating in Gaza since 2009. In 2013, it opened an office in Gaza, headed by Mr Ahmed Abbasi since its establishment. In an outrageous act, Mr Abbasi was killed by Israeli forces alongside his brother on 16 November 2023 following a rocket strike as they returned from morning prayers.²⁸ According to the founder of the Gift of the Givers, Dr Imtiaz Sooliman, Mr Abbasi had been "directly targeted by the apartheid Israeli forces in Gaza".²⁹

27. Until 2 March 2025, Gift of the Givers was able to deliver vital humanitarian aid to the people of Gaza, in coordination with the Egyptian and Palestinian Red Crescents. While it was able to do so, it purchased fresh food quantities in Egypt which were sent into Gaza through the Rafah border crossing, and from there to the Karem Shalom border crossing. Having had to reduce its activities since 2 March 2025, the organisation currently has twenty volunteers who work with other humanitarian organisations to ensure the distribution of available food stuffs to people in Gaza.

28. In addition, Gift of the Givers has built a medical wing at Al-Shifa hospital, where it also runs four medical facilities, including a mobile clinic which remain partly operational. The organisation further operates desalination plants which it services when fuel is available in Gaza.

29. Following Israel's blockade of humanitarian aid on 2 March 2025, Gift of the Givers has been unable to deliver any form of assistance or aid to the people of Gaza. The uncertainty about when the blockade will be ended has rendered it unable to stockpile goods at the Egyptian border. It was, until 18 March 2025, able to use what had already entered Gaza until then, to provide food and meals to families desperately in need of assistance. These food and basic, essential supplies have since run out. At present, it is only able to send financial assistance to its volunteers in Gaza for distribution to the civilian population, however, as no commercial goods are available for purchase, this assistance is limited in effect and has not rendered any meaningful impact in addressing conditions of starvation in Gaza.

30. Gift of the Givers receives monetary and financial contributions from across the South African society, including from ordinary civilians, public and private companies and in solidarity with the Palestinian people. For instance, Aspen Pharmacare, a pharmaceutical company based in Durban, South Africa, in the months leading to the 2 March blockade, donated medicines to the value of USD 250 000 for distribution by the Gift of the Givers in Gaza.

31. The medical facilities being run by Gift of the Givers in Gaza are unable to function properly without much-needed medicines and medical equipment, which Israel's blockade is arbitrarily impeding. The organisation also assists children through psychological and recreational support, which is crucial in the context of a brutal Israeli war which disproportionately and intentionally impacts children.

²⁸ Gift of the Givers, "*Gift of the Givers backs motion seeking closure of Israeli embassy following Gaza office head killing*," *Daily Maverick*, 16 November 2023, <https://www.dailymaverick.co.za/article/2023-11-16-gift-of-the-givers-backs-motion-seeking-closure-of-israeli-embassy-following-gaza-office-head-killing>.

²⁹ *Ibid.*

IV. ISRAELI PROPOSAL TO DELIVER HUMANITARIAN SUPPLIES THROUGH HUBS

32. “Israeli officials have sought to shut down the existing aid system run by 15 UN agencies and 200 NGOs and partners,” said OCHA’s spokesperson, Mr. Jens Laerke, on 6 May 2025 in response to the Israeli proposal to create “humanitarian hubs” controlled by its military, and operated by private security contractors and international organisations³⁰ once Israel reopens the crossings into Gaza.³¹

33. International aid agencies have roundly rejected the Israeli proposal, with the Humanitarian Country Team in Palestine comprising both international and Palestinian humanitarian agencies, decrying the Israeli proposal. They stated that “we will not participate in any scheme that does not adhere to the global humanitarian principles of humanity, impartiality, independence and neutrality”.³²

34. On 6 May 2025, the Secretary General of the Norwegian Refugee Council (NRC) said, “[it] is a fundamental principle of humanitarian work that aid must be delivered in an impartial, independent, and neutral manner, to those who need it the most. It is totally wrong that a party to the conflict – in this case Israel – should be in control of lifesaving aid for civilians. This new Israeli aid plan is both totally insufficient to meet the needs in Gaza, and a complete breach of all humanitarian principles. We stand united with the UN and NGOs in rejection of this plan. We must be allowed to reach those in need in Gaza”.³³

35. South Africa equally rejects this proposal which contravenes Israel’s obligations as an Occupying Power under international humanitarian law. As pointed out to the Court extensively in the oral statements during the week 28 April to 2 May 2025, Israel must permit UNRWA and other UN agencies to continue operating in the Occupied Palestinian Territory without restrictions and in accordance with their mandated activities.

36. At the same time, Israel has introduced new procedures for humanitarian aid organisations to secure permits to register in Israel, and existing humanitarian organisations working in the Occupied Palestinian Territory may be de-registered by Israel, for ‘delegitimising’ the State of Israel – acts which broadly include advocating for Palestinian rights and calling for boycotts of Israel. As some 55 international humanitarian organisations operating in Palestine warn, “Israeli authorities can shut out organisations merely for speaking out about conditions they witness on the ground, forcing INGOs to choose between delivering aid and promoting respect for the protections owed to affected people.”³⁴

37. The proposal by Israel to create militarised humanitarian hubs appears to be coupled with its intention to “conquer Gaza”. Under the proposal, the “IDF plans to completely clear the northern part of

³⁰ *The Times of Israel*, “UN, aid groups hit out at Israeli plans for resuming Gaza aid distribution,” 3 May 2025, <https://www.timesofisrael.com/un-aid-groups-hit-out-at-israeli-plans-for-resuming-gaza-aid-distribution/>.

³¹ UN News, “Gaza: UN aid teams reject Israel’s new plan for aid deliveries, calling it ‘deliberate attempt to weaponize aid,’” *UN News*, May 2025, <https://news.un.org/en/story/2025/05/1162946>.

³² United Nations Office for the Coordination of Humanitarian Affairs (OCHA), “Statement by the Humanitarian Country Team of the Occupied Palestinian Territory – on principled aid delivery in Gaza,” 1 May 2025, <https://www.ochaopt.org/content/statement-humanitarian-country-team-occupied-palestinian-territory-principled-aid-delivery-gaza>

³³ Egeland, Jan. “After two months of devastating blockade and starvation of Gaza, Israeli officials demand that we shut down the universal aid distribution system run by the UN and NGOs like NRC. They want to manipulate and militarize all aid to civilians, forcing us to deliver supplies through hubs designed by the Israeli military.” X (formerly Twitter), 5 May 2025, https://x.com/NRC_Egeland/status/1919658920647270444.

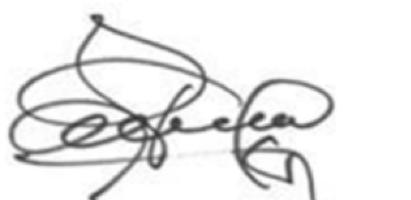
³⁴ Norwegian Refugee Council, *Israel’s New INGO Registration Measures Are a Grave Threat to Humanitarian Operations and International Law – 55 Organisations Say* (6 May 2025), <https://www.nrc.no/news/2025/may/Israels-new-ingo-registration-measures-are-a-grave-threat-to-humanitarian-operations-and-international-law--55-organisations-say>

the enclave, sending its citizens to southern Gaza, where a new humanitarian aid pilot program will begin” in furtherance of the “General’s Plan”.³⁵ The proposal would see Palestinians retrieve aid from a small number of sites, away from where they live, forcing families to move to get assistance. This would result in the forcible transfer of the civilian population, which is prohibited under international law.³⁶ The arrangement would further concentrate civilians in militarised zones which renders them extremely vulnerable in what could inevitably become “kill zones”. South Africa is also concerned that Israel, through its control of humanitarian aid, may severely limit the daily caloric intake of Gazans, to only that which is necessary for survival.

38. It is not for Israel to replace such UN entities with organisations and private contractors subservient to the will of the Occupying Power. The proposal would leave Palestinians extremely vulnerable to abuse and harm, as the absence of impartial, neutral, independent and humanitarian organisations in this context would serve only to conceal Israel’s ongoing atrocity crimes and violations of its obligations as an Occupying Power. The involvement of non-humanitarian organisations such as private security contractors, would place limitations on the ability of third States to provide humanitarian funding from their public fiscus, as these do not qualify as impartial humanitarian organisations.

V. CONCLUSION

39. South Africa is deeply alarmed by Israel’s ongoing blockade on Gaza. Events in recent days confirm that Israel’s end goal is to further its acquisition of Palestinian territory by force, and to forcibly displace and uproot Palestinians through its deliberate, forced starvation of the population and genocidal acts. Israel’s restrictions on the entry of humanitarian aid since 2 March 2025 impede third States from preventing this situation from arising. More crucially, Israeli restrictions prevent third States from rendering collective and individual relief schemes which serve to counter Israel’s starvation campaign and denial of critical medical assistance. Israel’s callous and inhumane conduct are in clear violation of international humanitarian law, its obligations as an Occupying Power and Member of the United Nations.



VP Madonsela

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**FOR AND ON BEHALF OF THE GOVERNMENT
OF THE REPUBLIC OF SOUTH AFRICA**

DATE: 7 May 2025

³⁵ Yonah Jeremy Bob, "IDF to clear northern Gaza, send civilians south for aid pilot program, says security source," *The Jerusalem Post*, 5 May 2025, <https://www.jpost.com/israel-news/article-852714>

³⁶ Art. 49, Geneva Convention Relative to the Protection of Civilian Persons in Time of War (Fourth Geneva Convention), 12 August 1949, 75 U.N.T.S. 287, entered into force 21 October 1950. Available at: <https://ihl-databases.icrc.org/en/ihl-treaties/gciv-1949>.

Brief Report on Humanitarian and Relief Activities in the Gaza Strip

During the past period, our teams have carried out several humanitarian and relief activities in the Gaza Strip, despite the immense challenges and complex security conditions. The main efforts included the following:

1. Emergency Health Response

Our teams established and equipped the Dar Al-Salam Field Hospital in Khan Younis Governorate, which began providing essential healthcare services to affected individuals. In addition, a mobile clinic was deployed to serve displaced communities in nearby camps, aiming to reach as many people in need of medical care as possible.

2. Field Challenges and Difficulties

Our teams faced a series of complex challenges that directly affected the implementation of humanitarian operations, most notably:

- **Bombardment and Direct Targeting:**

During the ceasefire period, a shelter camp was established in North Gaza Governorate (Beit Hanoun) , consisting of 200 tents and service facilities, with the aim of housing families who had lost their homes and displaced individuals. However, following a breach of the ceasefire by Israeli forces, an immediate evacuation order was issued, leading to mass displacement and social chaos.

Our teams were forced to evacuate the area and abandon warehouses, resulting in a significant loss of food and medical supplies, and a total collapse of the infrastructure in the area. Additionally, one of our media teams—who were assisting in documenting the humanitarian efforts and supporting the affected communities—was injured during the attack.

- **Random Targeting of Civilians and Insecurity:**

Due to indiscriminate shelling and the complete interruption of internet and communication networks, our teams experienced severe difficulties in movement and in delivering relief items to those in need.

Furthermore, on 27th of March 2025, the tent of our field team leader was directly targeted in Khan Younis Governorate leading to the tragic death of one of his children and causing him serious injuries that rendered him unable to continue his work. As a result, the projects under his supervision were suspended entirely.



- **Lack of Basic Supplies and Soaring Prices:**

Our teams reached a state of total paralysis due to the lack of necessities such as food and clean water, combined with the inability to purchase them because of closed border crossings. This situation caused an unprecedented surge in prices.

For example, at the beginning of March, a 25-kg sack of flour cost 65 Israeli Shekels; now, the price has risen to 1,800 Shekels.