

COUR INTERNATIONALE DE JUSTICE    INTERNATIONAL COURT OF JUSTICE

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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 ADVISORY OPINION)

EXPLANATIONS SUBMITTED ON BEHALF OF  
THE SECRETARY-GENERAL OF THE UNITED NATIONS  
IN RESPONSE TO THE REQUEST FROM  
THE INTERNATIONAL COURT OF JUSTICE OF 13 AUGUST 2025

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## I. Introduction

1. The Deputy-Registrar of the International Court of Justice (“the Court”), in his letter to the Secretary-General dated 13 August 2025, conveyed that “[w]ith reference to the proceedings concerning the request for an advisory opinion in 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*...the Court...has decided to request the United Nations, the State of Israel and the State of Palestine to give explanations on the situation since 7 May 2025 with regard to the provision of urgently needed essential supplies and basic services for the Palestinian civilian population in and in relation to the Gaza Strip.”

2. The present explanations are given in response to the above-mentioned request. They supplement the information already provided in the written statement of 27 February 2025, the oral statement of 28 April 2025 and the written replies of 7 May 2025 submitted on behalf of the Secretary-General of the United Nations.

3. During the period in question (7 May to 27 August 2025), the United Nations has remained central to the humanitarian response in the Gaza Strip, where it conducts its essential humanitarian mandate guided by the four humanitarian principles – humanity, neutrality, impartiality and independence – in line with General Assembly resolution 46/182 of 19 December 1991 entitled “Strengthening of the coordination of humanitarian emergency assistance of the United Nations” and other resolutions of the United Nations.

4. Since 7 May 2025, the catastrophic humanitarian situation in the Gaza Strip has worsened further. There is evidence of famine, which could have been prevented, mass displacement, extreme levels of deprivation, and a continued increase in civilian casualties, including children.<sup>1</sup> The Secretary-General has referred to the situation of the Palestinians in the Gaza Strip as a humanitarian catastrophe of horrific proportions,<sup>2</sup> and warned about the accelerating breakdown of humanitarian conditions in the Gaza Strip, where the last lifelines keeping people alive are collapsing<sup>3</sup> and the population remains gravely undersupplied with the basic necessities of life.<sup>4</sup>

5. The above-mentioned statements are based on information that will be detailed in paragraphs 7 to 40 below.

6. The information contained in the present document was collected directly by United

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<sup>1</sup> See [https://www.ipcinfo.org/fileadmin/user\\_upload/ipcinfo/docs/IPC\\_Famine\\_Review\\_Committee\\_Report\\_Gaza\\_Aug2025.pdf](https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_Famine_Review_Committee_Report_Gaza_Aug2025.pdf). See also <https://www.un.org/sg/en/content/sg/statement/2025-08-22/secretary-general-famine-gaza>, 22 August 2025.

<sup>2</sup> See <https://www.un.org/sg/en/content/sg/statement/2025-08-08/statement-attributable-the-spokesperson-for-the-secretary-general-%E2%80%93-gaza>, 8 August 2025.

<sup>3</sup> See <https://www.un.org/sg/en/content/sg/statement/2025-07-21/statement-attributable-the-spokesperson-for-the-secretary-general-%E2%80%93-the-deteriorating-humanitarian-situation-gaza>, 21 July 2025.

<sup>4</sup> *Ibid.*

Nations entities and other entities which are part of the broader United Nations system in the Gaza Strip or is based on other sources of information. In cases where these entities were not in a position to directly collect information in the Gaza Strip and the present document relies on other sources of information, such sources are clearly mentioned.

## **II. Restrictions on movements of humanitarian organizations into and within the Gaza Strip**

7. A number of United Nations entities and their humanitarian partners (hereinafter referred to as “humanitarian organizations”) have continued to carry out humanitarian operations in the Gaza Strip during the period in question as impartial humanitarian organizations. These include local and international non-governmental organizations which are carrying out activities in the Gaza Strip. In total, there are more than 170 humanitarian organizations in the Gaza Strip, including 15 United Nations entities and other entities which are part of the broader United Nations system,<sup>5</sup> components of the International Red Cross and Red Crescent Movement, 40 international non-governmental organizations (“INGOs”) and 120 local non-governmental organizations (“local NGOs”). The United Nations is not in a position to include information about the delivery of humanitarian assistance by and distribution methods of other actors in the Gaza Strip, including those outside the United Nations coordination. The activities of humanitarian organizations have continued to be stifled by a combination of intensified military activity, expansion of Israeli-militarized zones and areas placed under displacement orders by Israel, continued administrative obstacles related to the registration, presence and operational capacity of humanitarian organizations, and obstructions on the ability of humanitarian organizations to bring in and distribute humanitarian assistance at scale in the Gaza Strip through the United Nations coordination. These developments have significantly reduced the operational space for the activities of humanitarian organizations in the Gaza Strip.

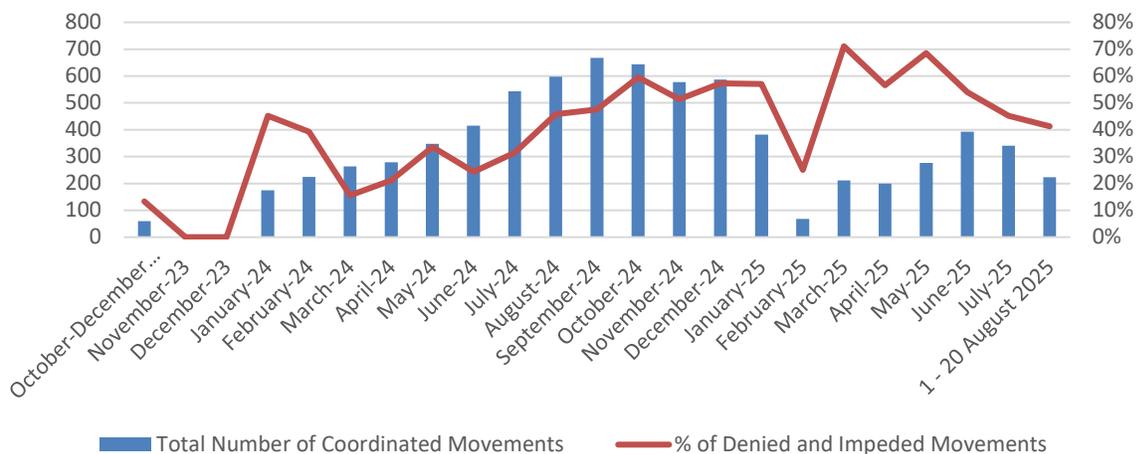
8. Humanitarian organizations in the Gaza Strip are required to coordinate their movements with the Israeli authorities. To put the recent situation on the ground in context, since October 2023, the combined percentage of attempts to coordinate movements within the Gaza Strip that were denied or impeded varied over time but has generally been above 40 per cent since August 2024, excluding the ceasefire between 19 January and 2 March 2025 (see figure 1). Out of more than 7,400 coordinated aid movements between October 2023 and 20 August 2025, 45 per cent were facilitated by Israeli authorities, 17 per cent were impeded (some of which were eventually accomplished fully or partially despite the impediment), 28 per cent were outright denied and nine per cent were cancelled.

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<sup>5</sup> The United Nations entities in question are the Office for the Coordination of Humanitarian Affairs (OCHA), the Office of the High Commissioner for Human Rights (OHCHR), the United Nations Children’s Fund (UNICEF), the United Nations Development Programme (UNDP), United Nations Department of Safety and Security (UNDSS), the United Nations Entity for Gender Equality and the Empowerment of Women (UN-Women), the United Nations Mine Action Service (UNMAS) of the Department of Peace Operations, the United Nations Office for Project Services (UNOPS), the United Nations Population Fund (UNFPA), the United Nations Relief and Works Agency for Palestine Refugees in the Near East (UNRWA), the World Food Programme (WFP), the United Nations Special Coordinator for the Middle East Process (UNSCO). The other entities which are part of the broader United Nations system are the following specialized agencies: the Food and Agriculture Organization of the United Nations (FAO), the United Nations Educational, Scientific and Cultural Organization (UNESCO), and the World Health Organization (WHO).

9. In general, figures related to the coordination of movements within the Gaza Strip with Israeli authorities to carry out a range of humanitarian activities – such as collection, storage or delivery of supplies, service provision, staff movements, infrastructural repairs, evacuation of patients, including injured people, and carrying out assessments – need to be understood and situated within the broader context of the level of access to the Gaza Strip, military operations and impediments to aid delivery at any point in time. During the ceasefire period (19 January to 2 March 2025), humanitarian organizations did not generally need to coordinate their movements with the Israeli authorities.

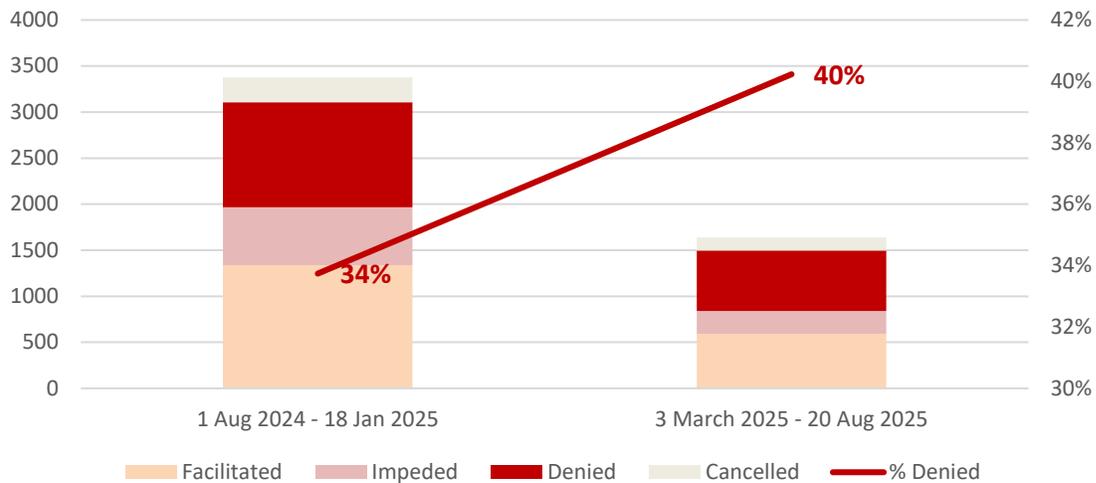
**Figure 1: Percentage of Denied and Impeded Movements out of the Total Number of Coordinated Movements in the Gaza Strip, October 2023 -- 20 August 2025**



10. Since the end of the ceasefire on 2 March 2025, including 11 weeks of complete denial of entry of all supplies into the Gaza Strip (until 18 May 2025) and a subsequent period in which limited aid delivery was allowed, the submission of requests for movements by humanitarian organizations within the Gaza Strip drastically decreased. This decrease is because no humanitarian assistance was coming into the Gaza Strip and because movements to large parts of the Gaza Strip were not possible due to the expansion of Israeli-militarized zones and areas subject to displacement orders, with Rafah and North Gaza Governorates being largely off-limits. Furthermore, the requests for coordinated movements submitted by the United Nations Relief and Works Agency for Palestine Refugees in the Near East (UNRWA), a subsidiary organ of the United Nations General Assembly and the largest United Nations entity in the Gaza Strip, had accounted for more than a third of requests in the last four months of 2024. However, with Israel’s Law to Cease UNRWA Operations entering into force at the end of January 2025, UNRWA has not been able to deploy international staff to the Gaza Strip since then. As such, UNRWA is no longer among the organizations submitting requests to coordinate the movements of its staff in the Gaza Strip, and other United Nations entities have not been submitting such requests on behalf of UNRWA. In late March 2025, the United Nations also decided to reduce temporarily the Organization’s footprint in the Gaza Strip following the end of the ceasefire and

the return to hostilities.<sup>6</sup> Due to fewer supplies and offloading, looting of aid, less physical access in militarized zones and areas subject to displacement orders and reduced footprint in the Gaza Strip, the overall number of coordinated aid movements within the Gaza Strip decreased by more than 50 per cent (from 3,376 to 1,638 movements) while the percentage of denied movements increased from 34 to 40 per cent (see Figure 2).

**Figure 2: Coordinated Aid Movements Before and After the Ceasefire**



11. The entry of humanitarian assistance and commercial supplies into the Gaza Strip was completely denied for 11 weeks (2 March to 18 May 2025), including part of the period covered by the present submission (7 to 18 May 2025). By 18 May 2025, stocks of medical supplies – including blood and anesthetics – as well as food and fuel were heavily depleted. On 18 May 2025, the Israeli authorities indicated that they would allow humanitarian organizations to resume limited aid entry, initially only allowing the entry of food, nutrition and medical supplies. On 5 August 2025, the Israeli authorities approved a mechanism for the gradual and controlled resumption of the entry of commercial supplies into the Gaza Strip.<sup>7</sup>

12. Between 7 May and 20 August 2025, out of 1,178 attempts to coordinate planned aid movements across the Gaza Strip, about 32 per cent were denied by Israeli authorities and 38 per cent were facilitated. An additional 19 per cent were initially accepted but faced impediments, while the remaining 11 per cent had to be withdrawn by the organizers for logistical, operational or security reasons. Denied movements included those which were intended for repair works on telecommunication and water infrastructure.

13. Restrictions on the entry of humanitarian supplies and commercial goods are key factors that have undermined the population’s capacity, at both household and community levels, to

<sup>6</sup> See <https://www.ochaopt.org/content/note-correspondents-gaza>

<sup>7</sup> See <https://x.com/cogatonline/status/1952604838765760535?s=46&t=FY3aRVR3ZaKVrABjS3VXXg>

survive. As a result of such restrictions, the humanitarian response remains insufficient to meet the needs of 2.1 million people who have directly suffered the consequences of ongoing bombardment, famine, the spread of disease, repeated displacement, the lack of electricity, diminishing access to water and massive destruction of all life-sustaining infrastructure.

14. As at 20 August 2025, only nine humanitarian organizations<sup>8</sup> delivering supplies through manifests coordinated by the United Nations have been able to dispatch humanitarian assistance to the Gaza Strip. This is in addition to one United Nations entity which facilitates the entry and distribution of fuel supplies through a separate process.<sup>9</sup> Thus, the ability to bring in supplies to the Gaza Strip has been extremely limited. Since the resumption of limited aid entry on 19 May 2025 and until 16 June 2025, Israeli authorities allowed aid entry only through Kerem Shalom crossing in southern Gaza. Since 16 June 2025, supplies have been permitted to also enter through Erez West/Zikim crossing in northern Gaza.<sup>10</sup> Rafah and Erez crossings still remain closed as at 27 August 2025. Since early August 2025 and as at 20 August 2025, the delivery of aid from Jordan to the Gaza Strip, which was re-authorized by Israeli authorities in early June 2025, has been paused by Israeli authorities until further notice (with the exception of direct government-to-government arrangements), reportedly due to the lack of security escorts for aid convoys.

15. Since 18 March 2025, the rates of denials of the entry of health professionals into the Gaza Strip have risen by nearly 50 per cent, with 102 critical international Emergency Medical Team (EMT) health professionals, including surgeons and other specialized medical staff, barred from entry. According to WHO, complex entry requirements and the arbitrary denial of international EMTs are severely impacting the availability of health services in the Gaza Strip.<sup>11</sup> In parallel, there has been a sharp decline in medical evacuations from the Gaza Strip since the resumption of hostilities in early March 2025, which also resulted in a severe deterioration in access to healthcare and reflected the difficulties in accessing humanitarian corridors. Between 7 May and 13 August 2025, 329 patients, including 263 children, were medically evacuated abroad<sup>12</sup>, compared with 1,702 patients, including 606 children, medically evacuated between 19 January and 17 March 2025.<sup>13</sup> The medical evacuation process is severely constrained by multiple approval layers, security clearances, coordination challenges, and border access, with current figures representing only a small fraction of the over 14,800 patients needing care outside the Gaza Strip, while referral routes to facilities in the West Bank, including East Jerusalem, remain

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<sup>8</sup> See <https://www.ochaopt.org/content/gaza-humanitarian-response-update-3-16-august-2025>. The nine organizations currently able to deliver supplies are five United Nations entities (UNDP, UNFPA, UNICEF, WFP), one specialized agency (WHO), one entity of the International Red Cross and Red Crescent Movement, and three INGOs. During the ceasefire, there were 38 organizations able to deliver supplies, including eight United Nations entities, three entities of the International Red Cross and Red Crescent Movement, and 27 INGOs. In total, there are more than 170 humanitarian organizations in the Gaza Strip, including 15 United Nations entities and other entities which are part of the broader United Nations system, components of the International Red Cross and Red Crescent Movement, 40 international NGOs and 120 local NGOs who are cluster members and operational in the Gaza Strip.

<sup>9</sup> The United Nations entity in question is UNOPS.

<sup>10</sup> See <https://www.ochaopt.org/content/humanitarian-situation-update-297-gaza-strip>

<sup>11</sup> See <https://x.com/WHOoPt/status/1953021621247017383>

<sup>12</sup> See <https://app.powerbi.com/view?r=eyJrIjoiODAxNTYzMDYtMjQ3YS00OTMzLTkxMWQ0OTU1NWUwMzE5NTMwIiwidCI6ImY2MTBjMGI3LWJkMjQtNGIzOS04MTBiLTNkYzI4MGFmYjU5MCIsmiOjh9>

<sup>13</sup> See [https://www.emro.who.int/images/stories/palestine/documents/pdf/Medevac\\_infographics/Medevac\\_13\\_Aug\\_2025\\_-\\_final.pdf?ua=1&ua=1](https://www.emro.who.int/images/stories/palestine/documents/pdf/Medevac_infographics/Medevac_13_Aug_2025_-_final.pdf?ua=1&ua=1)

blocked by the Israeli authorities.

16. Humanitarian operations in the Gaza Strip have been hampered by significant and sustained bureaucratic processes, including restrictions on the entry of critical humanitarian items, armored vehicles and spare parts for trucks. Customs clearance further delayed the approval and clearance of supplies procured by the United Nations, such as essential security and communications equipment, including VHF radios and personal protective equipment. In addition, approval for items eligible for entry into the Gaza Strip, such as food, nutrition, health, hygiene, and water treatment supplies, has not in all cases been granted by Israeli authorities. Those supplies that reach the Gaza Strip's crossings then undergo multiple steps of cargo offloading from vehicles and cargo uploading on different vehicles before reaching the Gaza Strip side of the crossings. Moreover, since 13 July 2025, the very limited resumption of aid movement from Egypt has been hampered by Israeli-imposed customs clearance, causing delays, extra costs and bureaucratic hurdles for humanitarian organizations. Between 27 July and 3 August 2025, United Nations entities were temporarily exempted, while INGOs could receive case-by-case exemptions for health items. While the exemption has not been officially extended, it still appears to be in effect.

### **III. Shortage of supplies within the Gaza Strip**

17. According to the Integrated Food Security Phase Classification (IPC) report released on 22 August 2025, covering the period from 1 July to 15 August 2025, famine is currently occurring in Gaza Governorate.<sup>14</sup> It also projects famine thresholds to be crossed in Deir al-Balah and Khan Younis Governorates in the coming weeks.<sup>15</sup> In July 2025, humanitarian partners of United Nations entities reported more than 13,000 admissions of acutely malnourished children, which are double the number of admissions recorded in June 2025 and more than a six-fold increase compared with the 2,000 admissions in February 2025. According to the United Nations Children's Fund ("UNICEF"), the pace of this deterioration is alarming and requires that nutrition supplies urgently reach children before more lives are lost. The long-term impacts of acute malnutrition are devastating and generational, especially for children. It can lead to lifelong health issues like stunting, weakened immune systems and organ failure and can make learning and development harder, creating a cycle of poverty for the entire population. According to the health authorities in the Gaza Strip, as at 25 August 2025, 300 malnutrition-related deaths, including 117 children, were documented since October 2023. This includes 235 deaths since 1 July 2025, of whom 56 were children.

18. Since the 42-day ceasefire ended on 2 March 2025, the number of daily aid deliveries to the Gaza Strip has in general dropped from about 600 to an average of about 100 trucks. These figures include trucks from all providers of humanitarian aid and commercial supplies,<sup>16</sup> and are far below the volume procured and urgently required to meet the critical needs of the population

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<sup>14</sup> See [https://www.ipcinfo.org/fileadmin/user\\_upload/ipcinfo/docs/IPC\\_Famine\\_Review\\_Committee\\_Report\\_Gaza\\_Aug2025.pdf](https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_Famine_Review_Committee_Report_Gaza_Aug2025.pdf), p. 2.

<sup>15</sup> *Ibid.*

<sup>16</sup> See <https://govextra.gov.il/cogat/humanitarian-efforts/main/>

in the Gaza Strip.

19. The Food Security Sector, composed of United Nations entities and their humanitarian partners, estimates that more than 62,000 metric tons of food are required every month only to cover basic humanitarian food assistance needs.<sup>17</sup> The World Food Programme (“WFP”), as at 8 August 2025, had some 170,000 metric tons of food currently stored, under procurement or in transit, in the region to feed the entire population in the Gaza Strip for nearly three months.<sup>18</sup> Yet, between 19 May and 18 August 2025, available data on aid delivered to the Gaza Strip indicates that, due to the restrictions on aid deliveries, humanitarian organizations were able to collect from the relevant Gaza crossings only about 54,000 metric tons of food supplies. As at 20 August 2025, 88 community kitchens run by humanitarian partners were producing around 420,000 meals a day across the Gaza Strip. While this reflects a noticeable increase compared with the 259,000 daily meals produced in early August, it remains far below the one million daily meals that partners were able to distribute in April 2025 and is nowhere near the amount that is sufficient to cover the urgent needs of the population. Since 25 May 2025, bakeries supported by the United Nations have remained suspended due to insecurity and lack of supplies.

20. Malnutrition continued to ravage the Gaza Strip.<sup>19</sup> In July 2025, only three per cent of children under five and fewer than three per cent of pregnant and breastfeeding women received feeding and micronutrient supplements which they required.<sup>20</sup> As at 20 August 2025, malnutrition prevention stocks were nearly depleted after 11 weeks of complete denial of entry of humanitarian assistance into the Gaza Strip and limited entry since 19 May 2025, forcing programmes for children and pregnant or breastfeeding women to halt. While supplies exist outside the Gaza Strip, the breakdown of public order and other causes described in the present document have so far prevented humanitarian organizations from collecting them safely.

21. According to the World Health Organization (“WHO”), as at early August 2025, 52 per cent of essential drugs and 68 per cent of essential disposables are at zero stock, contributing to the catastrophic health situation across the Gaza Strip. Only 50 per cent of hospitals and 38 per cent of primary health care centres were functional, and there had been a stark reduction in medical points. Bed occupancy in hospitals, run by the health authorities in the Gaza Strip, had exceeded capacity, reaching close to 250 per cent at Shifa Hospital, 210 per cent at Rantissi, 180 per cent at Nasser, and 300 per cent at Ahli Hospitals.<sup>21</sup> The situation is especially critical at health facilities managed by UNRWA, which has been unable to bring in lifesaving medicines and medical supplies since 2 March 2025. At these facilities, 59 per cent of essential medicines (56 out of 95 items) are out of stock, including antihypertensive drugs, oral antibiotics for adults, antiparasitic products and iron supplements for children, while 12 per cent (11 items out of 95 items) are only available to cover one month of needs.

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<sup>17</sup> See <https://www.ochaopt.org/content/humanitarian-situation-update-315-gaza-strip>

<sup>18</sup> See <https://www.wfp.org/news/wfp-food-convoys-keep-moving-gaza-starvation-drives-lawlessness-leaving-most-vulnerable>

<sup>19</sup> See <https://www.ungeneva.org/en/news-media/press-briefing/2025/08/un-geneva-press-briefing-1>

<sup>20</sup> See <https://www.ochaopt.org/content/gaza-humanitarian-response-update-20-july-2-august-2025>

<sup>21</sup> See <https://www.ungeneva.org/en/news-media/press-briefing/2025/08/un-geneva-press-briefing-1>

22. Fuel entry into the Gaza Strip remains critically constrained and unpredictable, severely undermining the provision of lifesaving services that are entirely dependent on fuel in the absence of electricity. The Israeli authorities cut off electricity supply in October 2023, restoring temporarily only one line to the Southern Gaza Desalination Plant. Following 130 days of complete denial of delivery of fuel to the Gaza Strip, which placed hospitals, water and sanitation systems, bakeries, telecommunications and humanitarian operations at imminent risk of collapse, the delivery of fuel resumed on 9 July 2025.<sup>22</sup> As of 17 August 2025, approvals have been limited to 30 tankers per week, with large-scale entry confined to Kerem Shalom crossing, leaving northern Gaza dependent on unreliable delivery from southern Gaza to northern Gaza.<sup>23</sup> Israeli restrictions on UNRWA's access to fuel in the Gaza Strip have significantly impacted the delivery of its humanitarian services.

23. In July 2025, only 852,000 litres of diesel were available for humanitarian partners of United Nations entities for water, sanitation, and hygiene programmes ("WASH"), covering 62 per cent of the minimum required for critical interventions and 41 per cent of the total needed for emergency operations.<sup>24</sup> This shortage resulted in a 70 per cent decline in groundwater production and severely restricted water delivery, with 96 per cent of households reporting moderate to high water insecurity and 90 per cent of key persons within the shelters providing information noting worsened drinking water availability, compared with the ceasefire period when fuel was more readily available.<sup>25</sup> According to UNRWA, the provision of drinking water was halted for more than two weeks in July 2025 in certain areas of the Gaza Strip due to challenges in running generators. Severe fuel shortages have also crippled telecommunications in the Gaza Strip, disrupting mobile networks, Internet services and emergency systems reliant on backup generators, which in turn has created security risks, delayed humanitarian planning, and hindered convoy coordination. Alternative means of communication have not been effective in replacing the means of communication mentioned above since satellite phones were frequently jammed and VHF equipment was outdated.<sup>26</sup> Moreover, fuel shortages have limited the mobility of humanitarian partners; among others, this has resulted in the disruption of learning programmes provided to them, prevented the holding of group sessions which require the use of equipment powered by generators, and prevented the printing of materials and children's access to e-learning platforms which are reliant on power and Internet.<sup>27</sup>

#### **IV. Security situation hampering the delivery of humanitarian assistance**

24. Approved humanitarian routes are severely limited and often unsuitable, as many of them are impassable for long track convoys, pass through densely populated areas, are in areas that have presence of armed actors or are obstructed by destroyed infrastructure. Only in the first two weeks of August 2025, 11 incidents involving attacks on Palestinians guarding convoys have

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<sup>22</sup> See <https://www.ochaopt.org/content/joint-statement-ocha-ohchr-undp-unfpa-unicef-unops-unrwa-wfp-and-who-fuel-shortage-gaza>

<sup>23</sup> See <https://www.ochaopt.org/content/considerations-delivery-humanitarian-aid-during-ceasefire-gaza>

<sup>24</sup> See <https://www.ochaopt.org/content/humanitarian-situation-update-311-gaza-strip>

<sup>25</sup> See [https://drive.google.com/file/d/1DyMYkxMlm\\_xxaaF49XXE\\_P5CZGxXVMXI/view?pli=1](https://drive.google.com/file/d/1DyMYkxMlm_xxaaF49XXE_P5CZGxXVMXI/view?pli=1)

<sup>26</sup> See <https://www.ochaopt.org/content/considerations-delivery-humanitarian-aid-during-ceasefire-gaza>

<sup>27</sup> See <https://www.ochaopt.org/content/humanitarian-situation-update-311-gaza-strip>

been recorded in North Gaza and Deir al Balah Governorates.<sup>28</sup> With limited aid entry and growing desperation among people awaiting humanitarian assistance, the breakdown in public order and safety has contributed to recurring obstructions of aid convoys by both people seeking to feed their families and by armed actors.<sup>29</sup> As a result, the majority of collected supplies through the United Nations coordination were taken by such people or armed actors, with only a small percentage reaching partners' warehouses for planned distribution.

25. Casualties among people seeking food continued to take place and have sometimes forced humanitarian organizations to suspend the collection of supplies from crossings and fueled scarcity and insecurity in the Gaza Strip.

## **V. Impact of the displacement of population and military operations on humanitarian activities**

26. Between 7 May and 19 August 2025, the Israeli military issued about 40 displacement orders, forcing hundreds of thousands of people into overcrowded areas and restricting the United Nations' ability to deliver urgently needed essential supplies. As at 18 August 2025, over 86 per cent of the Gaza Strip was designated as militarized or subject to displacement orders or was in areas where they overlapped – an increase from 70 per cent in May 2025. The expansion has left only a few overcrowded and poorly equipped areas available for displaced populations, severely straining essential services, including shelter, health and sanitation.

27. As a result, the majority of WASH facilities inside the Gaza Strip remain largely inaccessible. As at 1 August 2025, 81 per cent of public WASH facilities and assets (567 out of 696) are within the Israeli-militarized zone or in areas which have been subject to displacement orders since 18 March 2025. These include water wells, desalination plants, reservoirs, stormwater basins, wastewater pumping stations, treatment plants, dumpsites, and the two official landfills. The displacement orders impede UNRWA's ability to continuously provide WASH-related services, including in the shelters. In May 2025, when 70 per cent of the Gaza Strip was within the Israeli-militarized zone or subject to displacement orders, or in areas where they overlapped, UNRWA was managing around 86 shelters, providing services for tens of thousands of displaced families in and around the shelters. Since then, UNRWA has been forced to cease its operations in a number of its installations in the Gaza Strip, including schools, designated emergency shelters, medical points, and warehouses, due to the expansion of Israeli-militarized zones, areas subject to displacement orders, and direct or indirect damage and other consequences to its installations caused by the hostilities. Currently, UNRWA is managing around 60 emergency shelters and providing services for tens of thousands of displaced families in and around the shelters.

28. Recurrent displacement orders continue to disrupt nutrition service delivery and the operations of health facilities and nutrition sites, often forcing suspensions or closures. Children

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<sup>28</sup> See <https://reliefweb.int/report/occupied-palestinian-territory/local-statement-attacks-security-personnel-gaza-enar>

<sup>29</sup> See <https://x.com/WFP/status/1947036919289741771>

and pregnant or breastfeeding women must walk long distances to access services, while hospitals have become inaccessible as populations are displaced from areas subject to displacement orders.

## **VI. Impact of the destruction of and damage to essential civilian infrastructure on humanitarian activities**

29. Civilian infrastructure in the Gaza Strip which is necessary to support the life of the population, including food security, has faced destruction, severely undermining humanitarian efforts. Local food systems have collapsed due to continued destruction of agricultural land and other food production infrastructure as well as attacks by Israel's military on fishers and fishing infrastructure. In August 2025, an assessment by the Food and Agriculture Organization of the United Nations and the United Nations Satellite Centre revealed that 98.5 per cent of cropland in the Gaza Strip was either damaged, inaccessible or both, and that no cropland in Rafah or North Gaza was accessible.<sup>30</sup> Already by the end of 2024, nearly all cattle and poultry had died.<sup>31</sup> Attacks on fishers and fishing infrastructure in the Gaza Strip continued into August 2025.<sup>32</sup> This destruction has contributed to the famine in the Gaza Strip, creating conditions which threaten the survival of Gaza's population.

30. Civilian buildings and infrastructure essential for the preparation and distribution of food, including community kitchens, markets, and infrastructure needed for the transportation of food and aid, have been hit. Between 8 and 14 July 2025, food-related facilities across the Gaza Strip, including at least one cafeteria, one food stand, three markets, and one community kitchen, were struck by Israeli attacks.

31. As at 8 July 2025, nearly 91.8 per cent of school buildings in the Gaza Strip (518 out of 564) were directly hit or damaged by attacks and are estimated to require either full reconstruction or major rehabilitation work to be functional again.<sup>33</sup> These include 95 school buildings in North Gaza Governorate, 194 in Gaza Governorate, 40 in Deir al Balah Governate, 123 in Khan Younis Governorate and 66 in Rafah Governorate. Most school buildings (432) have been directly hit, an increase of 26 school buildings from 4 April 2025, and include schools that were previously classified as damaged. Of the 26 schools which were damaged since 4 April 2025, 11 are government-run schools, eight are UNRWA schools and seven are private schools. Approximately two-thirds of school buildings (228 out of 346) that have served as shelters for internally displaced persons have been directly hit.

32. According to WHO, 115 attacks on healthcare facilities have been reported in the Gaza Strip between 1 January and 10 August 2025. These resulted in the killing of 50 people and the

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<sup>30</sup> See <https://openknowledge.fao.org/items/3a966c1f-c31b-4550-90bb-eca8efbe9c1f>

<sup>31</sup> See <https://www.fao.org/newsroom/detail/FAO-gaza-emergency-relief-food-production/en>

<sup>32</sup> See <https://www.un.org/unispal/document/building-to-starvation-systematic-attacks-on-fishing-in-gaza-and-implications-for-livelihoods-and-protection-may-2025/>

<sup>33</sup> See <https://reliefweb.int/report/occupied-palestinian-territory/verification-damages-schools-based-proximity-damaged-sites-gaza-occupied-palestinian-territory-update-10-july-2025>

injury of 119.<sup>34</sup> The highest number of attacks took place in North Gaza Governorate followed by Khan Younis Governorate, and most of the attacks happened in May 2025. The cumulative impact of these attacks, i.e. loss of life amongst health personnel, collapse of essential services and erosion of operational capacity, has rendered humanitarian work perilous and increasingly ineffective. As a result, as at 23 August 2025, 238 out of 636 health service points were partially functional, including 18 hospitals, 10 field hospitals, 66 primary health-care clinics, 119 medical points and 25 ambulance centres.<sup>35</sup> In his most recent statement issued on 25 August 2025, the Secretary-General strongly condemned Israeli strikes that hit Nasser Hospital in Khan Younis, which killed, among others, medical personnel and journalists.<sup>36</sup>

33. In addition, as at July 2025, all wastewater treatment plants in the Gaza Strip have not been operating, inter alia, due to infrastructure damage. Over 130,000 meters of pipelines have been damaged, most pumping stations are nonfunctional, and untreated sewage continues to flow into streets, shelters, and residential areas, posing significant public health risks.<sup>37</sup>

34. Physical attacks and damage to United Nations facilities have also continued. Between 7 May and 12 August 2025, 58 incidents impacting UNRWA premises and the people inside them have been reported. In a statement issued on 21 July 2025, the Secretary-General expressed concern over the strikes on two United Nations guesthouses, emphasizing that the locations of United Nations premises, which are inviolable, had been communicated to the parties. He recalled that “these locations, as with all civilian sites, must be protected regardless of evacuation orders.”<sup>38</sup>

## VII. Other factors impeding the activities of humanitarian organizations

35. Between 7 May and 19 August 2025, at least 91 humanitarian personnel, including 52 United Nations personnel, eight staff and volunteers of the Palestine Red Crescent Society (PRCS), four staff of the International Committee of the Red Cross (ICRC) and 27 personnel of other humanitarian organizations, have been killed in the Gaza Strip. This is roughly an average of one humanitarian personnel killed per day. Overall, between 7 October 2023 and 20 August 2025, at least 531 humanitarian personnel have been killed in the Gaza Strip, including 366 United Nations personnel<sup>39</sup>, of whom 360 were UNRWA personnel, 54 PRCS staff and

<sup>34</sup> See [https://www.emro.who.int/images/stories/Attacks\\_on\\_health\\_care\\_in\\_the\\_GS\\_10\\_Aug.pdf?ua=1](https://www.emro.who.int/images/stories/Attacks_on_health_care_in_the_GS_10_Aug.pdf?ua=1)

<sup>35</sup> See <https://app.powerbi.com/view?r=eyJrIjoiODAxNTYzMDYtMjQ3YS00OTMzLTkxMWQtOTU1NWUwMzE5NTMwIiwidCI6ImY2MTBjMGI3LWJkMjQtNGIzOS04MTBiLTNkYzI4MGFmYjU5MCIiImMiOjh9>

<sup>36</sup> See <https://www.un.org/sg/en/content/sg/statement/2025-08-25/statement-attributable-the-spokesperson-for-the-secretary-general-israeli-strike-nasser-hospital-gaza>

<sup>37</sup> See <https://drive.google.com/file/d/1ZZUaPeWYv-LdmtqLZ-AkSQVRMuBhIng3/view>

<sup>38</sup> See <https://www.un.org/sg/en/content/sg/statement/2025-07-21/statement-attributable-the-spokesperson-for-the-secretary-general-%E2%80%93-the-deteriorating-humanitarian-situation-gaza>

<sup>39</sup> The written replies submitted to the Court on 7 May 2025 on behalf of the Secretary-General of the United Nations referred to 295 United Nations personnel having been killed in the Gaza Strip between 7 October 2023 and 6 May 2025. This figure has been adjusted to 314 after additional information was verified and confirmed. As reported in the body of the text, between 7 May and 19 August 2025, 52 United Nations personnel were killed in the Gaza Strip. As such the total number of United Nations personnel killed between 7 October 2023 and 20 August 2025 was 366.

volunteers, four ICRC staff, and 107 from other humanitarian organizations. Some have been killed in their homes, and others while on duty.

36. Since the implementation by Israel of the Law to Cease UNRWA Operations, the Agency's operational capacity has been substantially impaired. The Israeli authorities have not been allowing the entry of international staff of UNRWA into the Occupied Palestinian Territory, including the Gaza Strip, since the end of January 2025. UNRWA still has around 12,000 Palestinian personnel in the Gaza Strip who continue to provide services and assistance amid severe limitations to their ability to operate. The Government of Israel has also continued to prevent UNRWA from bringing in any humanitarian assistance into the Gaza Strip, including medicines and medical supplies. UNRWA faced, among others, the denial of customs exemptions and of shipment registrations under UNRWA's name, delays in customs clearance by imposing additional approval requirements, additional scanning procedures of shipments, as well as a prohibition for UNRWA to collect humanitarian supplies from the Kerem Shalom/Karem Abu Salem crossing inside the Gaza Strip. UNRWA has around 6,000 truckloads of supplies waiting to enter the Gaza Strip, including enough food for the entire population of the Gaza Strip for more than three months, non-food items for the entire population of the Gaza Strip and lifesaving medicine and medical supplies to replenish all UNRWA health centers and medical points. Currently, 59 per cent of UNRWA essential supplies out of the total stock which is supposed to be stored in the Gaza Strip are out of stock due to the above-mentioned restriction.

37. Israeli authorities have continued to enforce the ban imposed in October 2023 on the deployment of national staff (who comprise the majority of humanitarian personnel in the Occupied Palestinian Territory) by humanitarian organizations from the West Bank to the Gaza Strip, thereby substantially undermining the delivery of humanitarian relief.

38. The detention of humanitarian personnel in the Gaza Strip has continued, undermining efforts to deliver life-saving assistance amid ongoing hostilities. Since 7 May 2025, the Israeli military have reportedly detained one additional UNRWA personnel. The whereabouts and fate of all detained UNRWA personnel remain unknown. Despite repeated requests for information and access to all of the UNRWA personnel detained by the Israeli military in the Gaza Strip, no information has been provided by the Israeli authorities regarding the circumstances of their detention, including since 7 May 2025. UNRWA has also routinely raised concerns regarding the medical conditions of specific detained UNRWA personnel, requesting that medical care be provided to them in line with international law and standards. No response has been provided to date. As at August 2025, at least 12 UNRWA personnel remain in Israeli detention.

39. Israeli authorities continue to impose restrictions on visas for international United Nations personnel, including denial of initial entry and non-renewal of staff and diplomatic visas for heads of United Nations entities. The issuance of visas for short-term missions from United Nations Headquarters has been more restricted, standard one-year visas have been reduced to one to two months for some entities and six months for others, and visas for certain specific functions are increasingly being denied.

40. Israeli authorities have continued to impose restrictions on INGOs operating in the Occupied Palestinian Territory, including the Gaza Strip, some of them being humanitarian partners of the United Nations. These restrictions include requirements for registration that require INGOs to disclose sensitive staff information. In July 2025, 29 INGOs which were not registered under the new system were not allowed to deliver life-saving supplies to the Gaza Strip, such as food, medicine, and hygiene items. Non-compliance with the new registration policies could result in the termination of humanitarian operations of the INGOs in the Gaza Strip and the West Bank, including East Jerusalem, and de-registration by 9 September 2025 or earlier. Palestinian NGOs would also be impacted, as they would not be able to receive essential supplies, funding, and technical support typically provided by INGOs. This measure is part of a broader set of newly imposed restrictions on INGOs which include denials of entry into the Gaza Strip by their international staff and, since 19 May 2025, the exclusion of most INGOs and all Palestinian NGOs from the mechanism established pursuant to Security Council resolution 2720 (2023) and approval of convoy manifests. Restricting the registration of INGOs limits the number of organizations able to operate in the Gaza Strip. These restrictions on the operational capacity hamper the delivery of vital aid and can force many INGOs to cease their activities, excluding them from participating in the coordinated humanitarian response mechanism and leaving vulnerable communities without essential life-saving support.

### **VIII. Continued relevance of the legal framework presented in the written and oral statements**

41. As far as the legal framework applicable to the presence and activities of the United Nations in the Occupied Palestinian Territory is concerned, reference is made to the written statement submitted to the Court on 27 February 2025 and to the oral statement presented to the Court on 28 April 2025 on behalf of the Secretary-General of the United Nations.

42. Respect for international legal obligations is an indispensable precondition for the United Nations to be able to implement its mandated activities.

43. It is recalled that all parties to a conflict must comply with all their obligations under international law, including international human rights law and international humanitarian law, at all times and that, in the context of the situation in Israel and in the Occupied Palestinian Territory, relevant international legal obligations are binding on several actors, including Israel, the State of Palestine, and all Palestinian armed groups.

44. Among the obligations set out in the written statement and the oral statement submitted on behalf of the Secretary-General, it is recalled that, if the whole or part of the population of an occupied territory is inadequately supplied, the occupying Power shall agree to relief schemes on behalf of the said population and shall facilitate them by all the means at its disposal, pursuant to Article 59, first paragraph, of the Fourth Geneva Convention. Israel, as the occupying Power, is required to fulfil this obligation in the Gaza Strip and more generally in the Occupied Palestinian Territory. It is only necessary to ascertain that “part of the population” of an occupied territory is “inadequately supplied”, and it is not necessary to ascertain that the whole of the population is

inadequately supplied. The obligations to agree to relief schemes and facilitate them arise for Israel in instances where part of the Palestinian population in the Occupied Palestinian Territory is inadequately supplied, whether it be in the West Bank or in Gaza. As soon as part of the population of an occupied territory is inadequately supplied, the occupying Power is required to agree to and facilitate relief schemes, and it continues to be required to agree to and facilitate relief schemes as long as part of the population of the occupied territory is inadequately supplied.

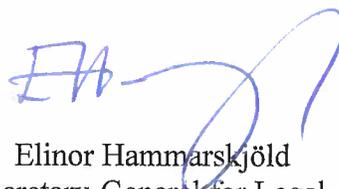
45. Since United Nations entities undoubtedly qualify as an “impartial humanitarian organization” under Article 59, second paragraph, of the Fourth Geneva Convention, as long as part of the population of an occupied territory is inadequately supplied, the occupying Power is required to agree to the relief schemes of such United Nations entities and facilitate them by all the means at its disposal.

46. It is also recalled that the authority of the occupying Power pursuant to Article 43 of the 1907 Hague Regulations and Article 64, second paragraph, of the Fourth Geneva Convention, may only be exercised in a manner that is consistent with other obligations of the occupying Power, including the obligation to agree to relief schemes and facilitate them. Such restrictions on the authority of the occupying Power also apply in instances where the occupying Power intends to make arrangements to ensure that consignments are intended for the population in need and, as such, requires Israel, as the occupying Power, to coordinate with United Nations entities and to remove all obstacles to enable such entities to carry out their relief schemes as planned in the Gaza Strip and elsewhere in the Occupied Palestinian Territory.

47. As such, the situation described above also relates to the privileges and immunities of the United Nations. In this regard, it is recalled that Israel, as a Member State of the United Nations and as a party to the 1946 Convention on the Privileges and Immunities of the United Nations (“the General Convention”), has an obligation to respect, in all circumstances, the privileges and immunities accorded to the United Nations enshrined in Article 105 of the Charter of the United Nations and detailed in the General Convention. Such privileges and immunities are applicable to all entities that are part of the United Nations, including its subsidiary organs established by the General Assembly, so that the independent performance of the mandates of United Nations entities and their personnel is guaranteed. The privileges and immunities set out in the General Convention include those which relate to the absolute and mandatory obligation to respect the inviolability of United Nations premises, property and assets at all times, including during armed conflict, in accordance with international law. The privileges and immunities set out in the General Convention also include the obligation to facilitate the movement of the Organization’s supplies, goods and equipment including by exempting them from any import prohibitions and restrictions. With regards to United Nations personnel, the General Convention contains provisions which relate to the immunity of United Nations officials and experts on mission from legal process, and to the obligation to facilitate the movement of United Nations personnel, including by processing visa requests speedily. The safety and security of United Nations premises, property, assets and personnel must also be guaranteed so that the Organization and its personnel may discharge their responsibilities and independently exercise their functions.

The above explanations are hereby submitted to the International Court of Justice on behalf of the Secretary-General of the United Nations.

New York, 27 August 2025

A handwritten signature in blue ink, consisting of the initials 'EH' followed by a large, stylized flourish.

Elinor Hammar-skjöld  
Under-Secretary-General for Legal Affairs  
and United Nations Legal Counsel