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The UN Relief and Works Agency for Palestine Refugees in the Near East (UNRWA) has long been criticized for its negative influence on the Israeli-Palestinian conflict, particularly in perpetuating an identity of permanent Palestinian refugeehood.

Since the Hamas-orchestrated October 7, 2023 massacre, numerous examples of incriminating behavior have surfaced revealing the extent to which UNRWA staff participated in and celebrated the atrocities, as well as the scope of Hamas military equipment and infrastructure present within UNRWA installations – including schools. This, after decades of reports noting similar developments.

In February 2024, the UN Secretary-General appointed the Independent Review Group on UNRWA, which published its findings on April 22 (Colonna Report). Though far from independent and largely exonerating UNRWA, the report hints at fundamental problems at an agency largely coopted by Hamas and other Palestinian terrorist groups.

As shown by detailed NGO Monitor reports, these phenomena also manifest, to varying degrees, at other UN agencies operating in the West Bank and Gaza, as well as with international and Palestinian NGOs – including those that partner with UN agencies in the area. The particular dynamics within UNRWA reflect broader trends affecting the humanitarian and civil society spheres operating in the region.

Therefore, a robust, steadfast, and effective response to the UNRWA crisis is crucial not only because of the agency’s significance. It will also set a precedent for reforming other aid mechanisms, protect against aid diversion, and ensure that humanitarian actors do not promote violent antisemitism.

UNRWA’s failures

Operating in territory controlled by a terrorist organization is inherently risky. Control over the levers of government – in particular the police and security apparatus – provides substantial means and opportunities for coercion that allow the terror group to influence international organizations and divert aid.

In the case of UNRWA, Hamas abused the agency’s facilities, locating munitions, tunnels, and headquarters within these supposedly civilian complexes.ⁱ

Moreover, just as the mafia may “recommend” that a local business hire a certain individual or buy from a specific vendor, so too, aid agencies operating in terror-controlled territory are often utilized by these organizations as sources of income, both for group members and for affiliated businesses and institutions.

The Colonna Report

The Colonna Report suffers from internal contradictions, conflicts of interest of its authors, and a disregard for extensive open-source incriminating information regarding UNRWA and its staff.

The head of this review, former French foreign minister Catherine Colonna, was appointed by the UN Secretary General, and pointedly, not by an independent body outside the UN framework. Colonna has a history of voicing support for UNRWA.ⁱⁱ

Additionally, three of the organizations tapped to conduct the review – the Danish Institute for Human Rights, Norway’s CHR. Michelsen Institute, and Sweden’s Raoul Wallenberg Institute – are all funded by their respective governments.ⁱⁱⁱ These governments stand out as those that have continued funding UNRWA throughout the current war, never freezing funding despite the mounting evidence of extreme wrongdoing.

As reported by the *Times of Israel* in April 2024, officials associated with these institutes have publicly demonstrated support to UNRWA, and have advanced accusations of “genocide” and “apartheid” against Israel.^{iv}

Despite these failings, the report nevertheless hints at a number of dimensions of Hamas’ influence over UNRWA that have implications for the broader humanitarian and policy community. These reflect the inherent pressures on humanitarian activity in terrorist-controlled territory. As such, the lessons from UNRWA must guide the US and other donors in developing and maintaining robust policies that govern support to all agencies operating in the region.

Intimidation and coercion

While defending supposed internal UNRWA oversight mechanisms, the Colonna Report notes that, prior to the Hamas-orchestrated October 7th massacre, “in Gaza and its field offices, the volatile context and security challenges may prevent reporting of allegations and investigating at the local level,” adding that “Field office investigators in Gaza risk their personal security.”^v

This is a sanitized acknowledgement of pervasive coercion, intimidation, and terror in Gaza, whereby reporting malfeasance and violations of ethics and standards invite harassment and retribution.

Public statements

Referring to the period between January 2022-February 2024, the Colonna Report blithely states that “Most alleged neutrality breaches relate to social media posts, reported to UNRWA through external sources.” The report fails to provide details or substance which would expose the agency and its staff.^{vi}

In January 2024, UN Watch revealed a 3,000-person Telegram group made up of UNRWA employees, which served as a platform for celebrating the October 7th massacre. According to the NGO, “the new report focuses on 30 UNRWA teachers who among other things called for the execution of Israelis, shared instructions on how to aid Hamas’ efforts, and proclaimed they would like to emulate the teachings that the October 7th terrorists received with their own children.”^{vii}

Vetting of staff and vendors

The Colonna Report discusses the issue of “neutrality of staff,” focusing more on policies and less on the real-world reality at UNRWA. In doing so, it avoids the crucial context of the extensive

membership of UNRWA staff in US-designated terrorist organizations – including Hamas, Palestinian Islamic Jihad (PIJ), and the Popular Front for the Liberation of Palestine (PFLP).

Recent reporting has addressed the extent of Hamas penetration into UNRWA staffing. Citing Israeli intelligence sources, on January 29, 2024, the *Wall Street Journal* wrote that “23% of Unrwa’s male employees had ties to Hamas,” and that “Nearly half of all Unrwa employees—an estimated 49%—also had close relatives who also had official ties to the militant groups, especially Hamas.”^{viii}

As the report acknowledges, UNRWA staff vetting is based on anti-terror screening tools that do not include any of the US-recognized Palestinian terrorist organizations, and is also largely based on self-reporting by applicants and by information provide by “local authorities,” – i.e., Hamas in Gaza.^{ix} This system is thus patently futile at implementing anti-terror vetting in the Palestinian context.

Alternatives to UNRWA – Effective vetting

UNRWA’s abject failure, unfortunately, is not unique. Rather, it is emblematic and representative of phenomena that plague other UN agencies, international NGOs, and substantial segments of Palestinian civil society. Therefore, ensuring that US taxpayer funds do not support violence, extremism, or antisemitism requires a holistic and broad review of the other organizations and institutions operating in the region.

Congress appears to recognize this fact. Section 3 of the “Stop Support for UNRWA Act of 2024” reads:

Nothing in this Act may be construed to preclude the provision of humanitarian assistance through any agency or entity other than UNRWA to individuals or entities that also receive assistance from UNRWA if the Secretary of State certifies to Congress that such other agency or entity—

(1) does not promote, espouse, or affiliate with entities or individuals that promote violence, terrorism, or antisemitism, as such term is defined by the IHRA Working Definition of Antisemitism; and

(2) does not employ individuals who promote, espouse, or affiliate with such entities or individuals.

This language reflects the need to grapple with the prevalence of those phenomena in other aid agencies and their partners, within the context of UNRWA-related policy recommendations.

Current US funding

The scale of US funding to the region reinforces the need for robust vetting to safeguard taxpayer funds. As of March 1, 2024, the US government had pledged over \$180 million in funding for UN and NGO operations in the West Bank and Gaza, since October 7.^x According to the UN Financial Transparency System (FTS), from 2021-2024, the US has provided over \$480 million to activities in the region.^{xi}

Notably, this funding has not been fully transparent. According to the UN FTS, during 2023-2024, the US is providing approximately \$40 million to partners listed as “confidential” that are operating in the West Bank and Gaza.^{xii} Likewise, according to [usaspending.gov](https://www.usaspending.gov) – a website that tracks Federal grants and contracts – over \$60 million has been provided to organizations labeled as “Miscellaneous Foreign Awardees” operating in the region during this period.^{xiii}

Hamas’ strategy of commandeering aid agencies

In addition to UNRWA, Hamas has sought to control other UN agencies and international NGOs, in their bid to exploit Western-funded aid apparatuses. For over a decade, Hamas has worked to

systematically divert aid funds, services, and materials, as well as utilize international agencies and NGOs as platforms for intelligence gathering.

In August 2016, Israel announced the arrest of Wahid Borsh, a Gaza-based engineer working for the UN Development Programme (UNDP). Israeli security officials accused him of being directed by Hamas operatives to use his position in the UN agency to provide materials and services to the terrorist organization.^{xiv} According to his 2017 conviction, after being approached by Hamas, he allowed 300 tons of post 2014-conflict rubble to be transferred to the terror group – presumably to be repurposed for construction.^{xv}

Just days before announcing Borsh's arrest, Israel revealed that it had apprehended Mohammed El-Halabi, serving at the time as the Gaza director for World Vision, an international aid agency.

El-Halabi's June 2022 conviction reveals that Hamas had instructed him to join World Vision, so that he could divert the NGO's materials to the terrorist organization. Likewise, according to the conviction, he recruited a senior Save the Children employee in Gaza, so that the latter would provide Hamas with intelligence, including "the identities of individuals appointed by the United States to sensitive positions in international organizations in the Gaza Strip" (translated from the original Hebrew by NGO Monitor).^{xvi}

The charge sheet lays out a litany of other violations. While at World Vision, El-Halabi provided building materials to Hamas for constructing and concealing military installations – including tunnels – procured weapons, collected intelligence on Israeli positions, diverted funds, hired Hamas members, and manipulated the World Vision tender process to benefit Hamas.^{xvii}

Moreover, according to the conviction, El-Halabi ensured that "the majority" of World Vision-funded packages of "food and hygiene products, blankets, etc.," were "regularly provided" to members of Hamas military units, including during periods of armed conflict with Israel.^{xviii}

Importantly, World Vision is a regular partner in UN-coordinated projects in the West Bank and Gaza. According to the UN FTS, since 2020, World Vision branches have received over \$3.2 million as the primary implementing partner on multiple projects.^{xix}

UNRWA parallels with other organizations

Intimidation and coercion – World Vision

According to Mohammad El-Halabi's June 2022 conviction (see above), in 2015, a Gaza-based World Vision accountant informed his employers that he suspected El-Halabi of diverting funds to Hamas. He was subsequently fired and then interrogated by Hamas. Damningly, El-Halabi had a copy of the interrogation on his personal computer:

"Furthermore, the circumstances of Mohammed Mehdi's firing from the WV (World Vision) organization, his interrogation by Hamas and the discovery of his interrogation on the defendant's personal computer that was seized by the Shabak [Israel Security Agency] also constitute a significant evidential addition to the defendant's confession."^{xx} (Translated from the original Hebrew by NGO Monitor)

This episode represents a clear and unfortunate example of the pressures that discourage effective internal oversight of aid agencies operating in Gaza.

Public statements – Palestinian NGOs

The abhorrent statements made by UNRWA employees are indicative of widely held beliefs in Palestinian society, often expressed by officials, board members and employees of Palestinian

“human rights” and “humanitarian” NGOs. This is also true of local groups that partner with UNRWA and other UN agencies.

For instance, in 2021, UNRWA partnered with Palestinian NGOs Al-Haq, the Palestinian Centre for Human Rights (PCHR), and other NGOs on a project coordinated in part by the UN Office of the High Commissioner for Human Rights, ostensibly intended to document international law violations.^{xxi}

These NGOs, as well as their employees and officials, have celebrated and justified violence – including in certain post October 7th statements.

Al-Haq:

- On October 7, Al-Haq Legal Researcher and Advocacy Officer Aseel Al-Bajeh tweeted “Leave our land, get out of our faces,” attributing the message to Hamas leader Ismail Haniyeh Haniyeh.^{xxii}
- On October 10, Al-Haq Head of the Training and Capacity Building Unit Ziad Hmaidan quoted an Islamic text on Facebook, writing, “It is written in the Hadith: ‘You must wage jihad. The best jihad is preparing for war, and it is best to prepare for war in Ashkelon.’”^{xxiii}
- On October 10, Al-Haq Legal Researcher and Advocacy Officer Ahmed Abofoul tweeted, “It is outrageous to call on Palestinian resistance (permitted by international law) to CEASE its attacks while asking the occupying power ONLY to respect IHL [international humanitarian law].”^{xxiv}
- On January 28, 2023, seven Israeli civilians were murdered by a Palestinian terrorist outside of a Jerusalem synagogue. Following the massacre, Al-Haq’s Aseel Al-Bajeh (see above) wrote, “Why are settlers allowed to be in occupied Jerusalem, a war crime that the world recognises?”^{xxv} adding separately, “Forcing Palestinians to Defend their Right to Resist is Another Complicity with Israel’s Colonialism.”^{xxvi}

PCHR:

- In May 2023, as Islamic Jihad and other terrorist organizations launched over 1,200 rockets toward Israeli population centers - each one a war crime - PCHR published a statement in which it “affirms the Palestinian people to resist the occupation by all available means, including armed struggle....”^{xxvii}
Under pressure from donors, this text was amended.
- In an interview given two days after the January 28, 2023 shooting outside of a Jerusalem synagogue, Mkhaimar Abusada – Deputy Chair of PCHR’s Board of Directors, said that Palestinians are not prevented “from taking revenge against the massacres that are occurring in Palestine,” adding, “The flame of Palestinian resistance shall not end, but continue as long as there is occupation, settlement and Judaization.”^{xxviii}

US-funded NGOs

The US government has also funded Palestinian NGOs that have partnered with officials from US-designated terrorist organizations and promoted violence against Israelis.

For instance, as NGO Monitor revealed on the eve of the war, in 2023, the State Department provided \$90,000 in funding to the Gaza-based Phoenix Center.^{xxix} This, despite the fact that Phoenix’s website featured articles in which the NGO called for increasing “armed resistance,” against Israel, and launching a “third intifada.” Additionally, the organization publicized its cooperation and collaboration with senior PIJ officials.^{xxx}

In 2021 and 2022, NGO Monitor also published analyses of USAID funding that revealed support for Palestinian NGOs that glorified violence against Israelis and whose officials praised US-designated terrorist organizations.

- For instance, in 2022, USAID provided \$78,000 to the Community Development and Continuing Education Institute (CDCE-I).^{xxxii} In 2019, CDCE-I board chair, Imad Al-Zeer, participated in an event celebrating the 52nd anniversary of the founding of the PFLP terrorist organization.^{xxxii}
- NGO Monitor’s 2021 report, “USAID-funded Palestinian NGOs: Introducing Children to Convicted Terrorists,” includes myriad examples of US-funded NGOs presenting convicted terrorists as role models, praising specific acts of terrorism, and encouraging children to support violence, hostage taking, and incarcerated terrorists.^{xxxiii}

Like the statements made on social media by UNRWA staff, these examples were all taken from open sources and should have been discovered by US officials tasked with vetting grantees.

Such revelations should reinvigorate US vetting of other UN and NGO actors operating in the region, many of whose board members, officials, and employees are guilty of promoting the same type of incendiary and hate-filled rhetoric.

Employing members of terrorist organizations – Union of Agricultural Work Committees

As described above, a substantial portion of UNRWA staff appear to be linked or affiliated with Hamas, beyond those with ties to groups like PIJ or the PFLP.

This phenomenon extends beyond UNRWA. As NGO Monitor has repeatedly documented, UN agencies operating in the West Bank and Gaza consistently partner with terror-linked NGOs employing members of US-designated terrorist organizations.

The Union of Agricultural Work Committees (UAWC) is a prime example. Like UNRWA, it presents itself as a humanitarian actor. Like UNRWA, it has a substantial presence of terror group members on staff.

Identified by a 1993 USAID-engaged audit as the PFLP’s “agricultural organization,”^{xxxiv} UAWC was designated as a terrorist entity by Israel in 2022 due to its relationship to this terror group.^{xxxv}

Two UAWC officials, Samer Arbid and Abdel Razeq Farraj, are currently on trial for their role in the 2019 murder of 17-year-old Israeli Rena Shnerb in a PFLP bombing.^{xxxvi} The PFLP has identified both as members of the organization and took responsibility for the killing.^{xxxvii}

On January 5, 2022, the Netherlands announced the cancellation of a contract with UAWC citing ties to the PFLP. A report by an independent investigation commissioned by the Dutch government confirmed that 34 UAWC employees from 2007- 2020 had ties to the PFLP, some holding leadership positions in the terrorist group concurrent to their employment at the NGO.^{xxxviii}

Likewise, on February 13, 2024, German news outlet *Frankfurter Allgemeine Zeitung* reported that Germany decided to end funding to UAWC and other PFLP-linked NGOs.^{xxxix}

However, despite the wealth of evidence tying UAWC and its officials to the PFLP in general – and to violent acts of terrorism in particular – UN agencies continue to fund and partner with the group.

From 2021-2023, UAWC has served as an implementing partner on at least two UN-coordinated projects, totaling at least \$660,000.^{xl}

In February 2024, the Food Security Cluster – a mechanism jointly run by the World Food Programme (WFP)^{xli} and the UN’s Food and Agriculture Organization (FAO) – provided details on its \$445 million “Operational plan for the Gaza 30-Day Ceasefire,” with a target “to assist 2.2 million people through various response modalities, including Cash and Voucher Assistance (CVA), in-kind distribution, blanket distribution, and parcels.” UAWC is listed among the implementing partners.^{xlii}

Notably, according to the UN FTS, the US government is providing \$11 million to the World Food Programme (WFP) in 2023-2024 for its operations in the West Bank and Gaza.^{xliii}

Supporting terror-linked NGOs – OCHA

The UN’s Office for the Coordination of Humanitarian Affairs (OCHA) executes the UN’s regional humanitarian response plan, facilitating and providing funds to dozens of NGOs operating in the West Bank and Gaza annually.

OCHA is currently coordinating Gaza aid, seeking approximately \$2.7 billion from donors for “emergency” activities in the West Bank and Gaza.^{xliv} According to the UN FTS, it has also received approximately \$1.4 billion, since the war began.^{xlv}

NGOs that receive funding via OCHA-coordinated projects include terror-linked and terror-supporting organizations – including groups mentioned above such as Al-Haq, PCHR, UAWC, and others.

Moreover, as NGO Monitor demonstrated in our March 2021 report, “UN OCHA-oPt: Exploiting Humanitarianism to Advance Political Warfare,” OCHA has given terror-linked NGOs crucial policy-influencing roles within OCHA frameworks.^{xlvi} For instance, NGO Monitor’s report detailed the inclusion of the Palestinian NGO Network (PNGO) on OCHA’s Humanitarian Country Team (HCT) decision-making body. PNGO has long campaigned against anti-terror vetting regulations, making rejection of USAID’s anti-terror certification (ATC) a requirement for membership in the umbrella organization.^{xlvii}

Notably, OCHA has also decreased transparency in recent years, publishing less information about projects, partners, and grantees.

Recommendations

The above examples are a small percentage of the incidents demonstrating the widespread infiltration of aid agencies and NGOs operating in the West Bank and Gaza by Hamas, the PFLP, and other terrorist organizations. Similarly, cataloging the numerous examples of UN and Western-supported NGOs whose officials support and justify violence is beyond the scope of this submission.

It is therefore necessary to formulate new standards for safeguarding US taxpayer-funded assistance, in grants to both UN and NGO actors.

- When vetting potential grantees and partners, US officials must review publicly available information regarding those entities’ activities and statements as they pertain to supporting US-designated terrorist organizations, glorifying violence, or promoting antisemitism.

Such a review should include scrutiny of the NGO’s “key individuals,” as defined by USAID.^{xlviii} Additionally, this vetting should be conducted independently, and not rely on self-reporting by potential grantees.

- The US should engage with UN officials to reform UN mechanisms. UN agencies and officials should not fund, partner with, or solicit information provided by terror-linked NGOs and by organizations that support violence and antisemitism. The US should ensure, minimally, that US-funded agencies operating in the region do not partner with such actors.
- US vetting standards must be maintained, even when NGOs receive US funds via a UN agency. As demonstrated above, UN policies are lax, with regards to staffing at UN agencies, NGO partners, and a limited list of restricted terror groups. Until sufficient and effective reform of UN mechanisms is implemented, US contributions to the UN or to UN-coordinated NGO activity should include robust vetting standards, to ensure that taxpayer funds are safeguarded from organizations that celebrate or justify violence, or promote antisemitism. Moreover, the US should insist that relevant Federal terror designations are applied to vetting partners on any UN project involving US taxpayer funds.
- US funding should be awarded transparently, including the publication of the names of grantees and implementing partners, as well as the amount of funds awarded and descriptions of the projects they are advancing.

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