



Research paper on:

Manifestations of corruption associated with the occupation's administration of the crossings of Gaza Strip during the genocidal war



2025



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The Coalition for Accountability and Integrity (AMAN) extends its appreciation to researcher Dr. Talal Abu Rukbeh for preparing this paper, and to Dr. Azmi Sha'aibi and AMAN team for supervising, reviewing and editing this paper.

The Coalition for Accountability and Integrity (AMAN) has exerted effort to verify the information contained in this paper, and bears no responsibility for the use of the information for purposes outside the context of the paper's objectives after its publication.

Introduction

The Gaza Strip has witnessed gross violations of the international humanitarian law (IHL) during the genocidal war that the Israeli occupation forces continue to launch. Those include imposing full Israeli control over all the border crossings of Gaza, as a direct tool of war, and as a tool for perpetuating the collective punishment against the Palestinian people.

The Israeli security forces monopolize the management of the crossings, and solely control all main operations in the crossings administration, including determining the names of the persons departing from Gaza Strip, managing entry of aid, commercial goods and relief aid necessary for the humanitarian operations such as tents, mobile houses, fuel, cooking gas, food aid and others. Implementing all those tasks is delegated by the Israeli government.

Those officials have ignored all increasing international appeals to provide safe and stable humanitarian routes for the entry of goods and aid to the inhabitants of the Strip. The occupation authorities have made no substantial change in their attitude towards the management of the crossing points, but rather continued to operate in closed channels through agents who determine who is allowed to bring in aid and who is not, according to an opaque system that opens room for the emergence of a network of local and international war profiteers. This has led to a total deformation in the priorities in aid distribution, and marginalization of the basic needs of civilians and transforming aid itself into a commodity based on power and privileges, not on need. The crossings authority was also used to impose restrictions on local and international humanitarian aid institutions, especially those of the United Nations agencies, which has become means for blackmail, bribery and special privileges, overlooking the basic principles of IHL.

The command and control operations of the crossings authority, including closures and the partial and limited opening are surrounded by suspicions of administrative and ethical corruption, and are in total contradiction with the legal obligations of the occupying power according to Geneva Conventions. The authority seeks to dismantle and eliminate the institutional system that had been applicable at the crossings prior to the genocidal war, in terms of the entry of aid or goods and the movement of individuals.

As the genocidal war continues, and with the systematic dismantling and destruction of any formal structures in the Palestinian context, numerous aspects of abuse of power related to the occupation authorities' management of Gaza's crossings have emerged. These include the misuse of authority in granting entry permits for humanitarian aid, manipulation of aid lists, imposition of illegal fees, and exploitation of unclear procedures for obtaining import permits for merchants at the crossings. Moreover, reliance on favoritism and monopolization, where only specific companies or merchants, recommended by military and security officers, are allowed to bring in goods.

The paper analyzes the key processes at Gaza's crossings under the control of the occupation authorities, as well as the corruption associated with their management as the occupying power under the Fourth Geneva Convention, and based on international resolutions that consider Gaza Strip and the West Bank as occupied territories subject to the Convention. The paper also seeks to examine the impact of this situation on corruption and on national anti-corruption efforts.

The paper highlights the structural and institutional corruption in the occupation's management of the crossings during Israel's genocidal war, which has created fertile ground for such unethical practices, and to analyze its repercussions on national anti-corruption efforts.

The paper adopts a descriptive analytical approach to examine and track the phenomenon, as it is the most suitable approach for tracking the transformations and changes in Gaza's crossings following Israeli domination and control. The paper relies on the analysis of relevant local and international data and reports, as well as in-depth interviews with specialists and parties concerned with the operation of the crossings.

General overview of the Gaza Strip crossings

Israel has imposed a comprehensive blockade on Gaza Strip, creating a series of obstacles that impede the movement of individuals and goods through the crossings it controls, using the crossings authority managed by the military rule. It controls the daily lives of Palestinians, effectively turning Gaza into an inescapable trap, with no exit except with the will and decisions of Israeli military crossings authority, and with no regard at all for international obligations or accountability to the citizens.

Before 7 October 2023, the crossings, particularly Karm Abu Salem (Kerem Shalom) and Beit Hanoun (Erez), constituted the main control points for the flow of goods, fuel, and humanitarian aid, and for regulating the movement of patients and workers through monopolizing travel permits. This reality revealed that the regime governing these crossings comprised a complex network of arbitrary and extortionary procedures, from controlling the number of trucks and the type or quantity of allowed goods, to imposing convoluted permit mechanisms, effectively using "humanitarian need" as a tool for financial and security extortion¹.

Currently, the occupation authorities have closed four of Gaza's six crossings, leaving only two operational: Beit Hanoun(Erez) and Karm Abu Salem (Kerem Shalom). Since 2007, the two crossings linking Gaza to Egypt, Rafah and Salah al-Din Gate², have remained shut. The absence of independent international oversight has granted Israel absolute freedom in managing these crossings without accountability³. These mechanisms can be categorized as follows:

1- Exploitation of the occupying power's total control over commercial and main crossings to serve private interests at the expense of citizens:

This is done under the pretext of security, justifying full inspections of trucks using electronic systems, as seen at Karm Abu Salem crossing. Officials often abuse this authority to arbitrarily restrict or prohibit certain goods, particularly construction materials, electronic equipment, and some medical supplies.

Furthermore, such control has enabled imposing a quota system based on opaque criteria set by occupation officials or intelligence agencies, with no binding local or international oversight.

2- Subjecting movement to security permits:

Individuals, whether patients or merchants, and goods are not allowed to enter or exit except upon obtaining conditional security approvals. This allows the responsible officer to engage in financial bargaining and extortion, demand information in exchange for granting permission, or use permits as a tool for political blackmail.

3- An ambiguous control system and conditional coordination

There is no transparent or unified system for disseminating information or procedures that define what is prohibited and what is permitted. Moreover, each movement at the crossings is subject to the authority of an Israeli security officer who is not accountable to any Palestinian or international entity for their decisions. These practices have become more complex and harsher during the ongoing Israeli genocidal war on Gaza.

1 Gisha – Legal Center for Freedom of Movement (2022), Separating Land, Connecting Control: Israeli Restrictions on Movement at Gaza Crossings.

2 Eyad Dweikat, "Gaza Crossings: Keys to a Lost Salvation" (2024), مفاتيح الفرج المفقود, Special Reports Series No. 126, Independent Commission for Human Rights, Ramallah, p. 19.

3 Hossam Younis, "Israel and the Redrawing of Gaza: Tools of Control and Reconfiguration" (أدوات السيطرة) في إعادة التشكيل, 2024, Peace Center for Strategic Studies. <https://2u.pw/HCNz5hKn>

Main operations in crossings management after the control of the Israeli occupation Control:

As a military authority, the Israeli occupation has sought to impose full control over entry and exit to and from Gaza Strip by establishing its absolute dominance over all aspects of movement to and from Gaza.

In the past year, the main operations in managing Gaza's crossings have been limited to selective entry of goods and aid, permitting travel for a limited number of individuals, particularly the wounded and foreign passport holders, whether through Ramon Airport or transit to Jordan. Entry and exit have been restricted to a small number of international relief workers operating in Gaza⁴.

On the other hand, the occupation authorities refuse to cooperate with elected representative bodies, such as the Chamber of Commerce and liaison officials, and do not recognize import licenses issued through the Ministry of Economy. Instead, they rely on a proprietary electronic system to determine which merchants are allowed to submit import requests, along with the supplying company, leaving the Israeli officer to approve or reject the entry of goods⁵.

However, the occupation authorities have restricted the privilege of obtaining "coordination" to a select few merchants in Gaza, no more than five, who are granted import permits for various types of goods, including items outside their usual trade, as long as they are on the list of permitted goods. Consequently, Gaza's economy has become monopolized by a small group of merchants with the occupation's approval⁶, at the expense of the public interest.

The Israeli occupation authorities control the movement of goods at Gaza's crossings without announcing any clear criteria or mechanisms for selecting companies allowed to import or export. These companies are: Azzou Aql, Al-Saqqa & Khudari, Al-Tawil, Najm, and Al-Khazandar (Gaza Petroleum)⁷.

Regarding transporting goods from the crossing into Gaza, the Israeli occupation has granted the exclusive privilege to Manhal Shheiber Transport Company to unload cargo from Israeli trucks at Karm Abu Salem crossing and transport it into Gaza, without announcing any tender or competition among qualified companies. Shheiber, in turn, subcontracted the following group of transport companies operating under its management: Al-Sharafi, Al-Ajalah, and Saleem Transport, all family-owned businesses⁸ selected without competition, bidding, or disclosed criteria.

It is worth noting that before the genocidal war, Shheiber Transport only handled unloading on the Israeli side of the crossing, leaving for other companies the right to compete for transporting goods into Gaza. However, during the war, the company monopolized the transport of goods and aid into Gaza⁹, leading to a transportation monopoly and exorbitant price hikes, directly impacting the prices of basic goods for Gaza's citizens.

Furthermore, during the war, "Move One"¹⁰, a U.S. logistics company based in Dubai, suddenly emerged and was granted the privilege of transporting aid into Gaza, again, without clear selection criteria by the occupation authorities.

4 A'ed Abu Ramadan, Director of the Chamber of Commerce in Gaza, personal interview on 7 May 2025.

5 Previous source.

6 Ahmad Al-Tannani, Israeli Investment in War Profiteers: Who Profits from Gaza's Hunger, 2025. https://www.noonpost.com/266701/amp/?utm_source=chatgpt.com

7 Previous source.

8 Mohammad Al-Sharafi, Board member at Al-Sharafi transport company, personal interview on 5 May 2025.

9 Previous source

10 <https://www.moveoneinc.com/>.

Local shipping companies in Gaza were surprised by this company's acquisition of transport rights, with no transparency or explanation for the selection mechanism, especially after it imposed exploitative contracts, against the law, on some transport companies, chosen under the directions of the occupation's crossings authority. These contracts charged extremely high fees amounting to 22,000 shekels per truck, while subcontracting drivers at 17,000 shekels per trip¹¹. The company also leveraged its authority to sign agreements with international relief organizations, such as the World Food Programme (WFP) and UNICEF to transport aid into their warehouses inside Gaza.

As evident, since Israel took control of all Gaza crossings, there have been no clear, transparent, or explicit mechanisms for obtaining import permits or bringing goods and aid into Gaza. The occupation authorities provide no reports on their operations, work plans, or management of the crossings. Gaza Chamber of Commerce has complained about the deliberate ambiguity and lack of clarity in granting privileges to certain companies over others¹².

Regarding the entry and exit of individuals through occupation-controlled crossings, since Israel's takeover of the Rafah crossing in May 2024, there has been no clear mechanisms for the entry and exit of individuals, except for international relief workers who receive entry and exit permits through coordination with their organizations' liaison officers and after security screening.

As for Palestinian citizens, movement is largely prohibited except in rare cases, with the exception of foreign passport holders, upon coordination through their embassies in Tel Aviv and the Red Cross for transit via Karm Abu Salem to Jordan. After that, they are transported based on their nationality. In some cases, a limited number of patients and injured individuals have been allowed out after coordination by the WHO, transferring them to host countries for treatment.

The main operations in the occupation's management of Gaza Strip crossings may be summed up as follows:

- The occupation authorities restrict the citizens' movement at the crossings without a security justification, which harms the citizens, in contravention with the Geneva Convention, which imposes obligations on the occupying power during war. This restriction is imposed through control, within a deliberate strategy to exert pressure on the population, rather than because of a security need, which leads to isolating Gaza at the logistic and security levels, to weaken the local administration and disrupt social stability¹³.
- Imposing excessive security inspection measures: These measures are the practices of the occupying power in managing Gaza's crossings. They aim to subject the entry of humanitarian aid and medical supplies to complicated restriction measures with the intention of starving the population, under the pretext of security. This includes banning many essential medical items, medications, and necessities specific to women and children¹⁴.
- The occupation's policies in crossings management have encouraged the emergence and spread of war profiteers, increasing their profits at the expense of public interest, particularly marginalized groups. They also opened the door to widespread corruption and favoritism, exacerbating rather than alleviating the humanitarian crisis¹⁵.

¹¹ Previous source

¹² A'ed Abu Ramadan, previous source.

¹³ Majd Sattoum, The Closure of Gaza's Crossings: Another Aspect of Collective Punishment and a Never-Ending Crisis, 2025, Institute of Palestine studies, <https://www.palestine-studies.org/ar/node/1657137>

¹⁴ https://www.btselem.org/arabic/gaza_strip

¹⁵ Amjad Al-Shawwa, PNGO, personal interview on 13 May 2025.

One of the most telling examples on the impact of those policies on humanitarian work is the phenomenon of selling aid coordination. This has empowered networks of major merchants and officials from some international organizations, who exchange and facilitate transportation and storage services for goods and aid in return for coordination privileges. These actors have become the dominant commercial power in Gaza, because of exclusive privileges granted by the Israeli occupation authorities, giving them the ability to control the price, type, and quantity of goods reaching the population at any time¹⁶.

- Selective management of goods and aid entry: Israel's management of the crossings follows a selective policy based on vague or political and security-driven priorities, with no transparency on the criteria or mechanisms used for allowing goods or aid into Gaza.
- Lack of clarity of procedures of issuing import and entry permits: Local and international humanitarian organizations have faced total ambiguity regarding the process of submitting and following up on import requests, whether for aid or equipment. The occupation has not issued a clear procedural manual or standard permit request form. Instead, suppliers are forced to deal with intermediaries or unofficial parties, opening the door to monopolization by specific companies linked to certain agendas or that have special relationships with Israeli occupation authorities.

A joint report by Human Rights Watch and Al Mezan Center for Human Rights (January 2024) indicated that over 60% of applications from humanitarian organizations were either rejected or ignored without explanation or an option to appeal. The report also noted that some suppliers were forced to pay "unofficial fees" through intermediaries to expedite or ensure the entry of shipments, which constitutes a clear case of administrative extortion¹⁷.

16 Mohammad Abu Jiab, Selling aid coordination is the lethal Israeli weapon against Palestinians in Gaza, (تنسيق المساعدات "سلاح إسرائيل الفتاك"), ضد الفلسطينيين في غزة (2025), AMAN, https://www.aman-palestine.org/media-center/28661.html?fbclid=IwY2xjawKQEZ9leHRuA2FlbQlXMAbicmlkETFia0pCN2lybXFvOEVRyZdsAR5lssYyEjN36pZYC1-IOUA03zlelXJV6c2Y-8uroqApksDnlraSuqHOek-Gog_aem_-K1TasVHE6_5XXX6t845Jg

17 <https://www.hrw.org/ar/report/2024/11/14/389665>

Generation of corruption phenomena

The Israeli occupation's control over Gaza's crossings has led to the emergence of multiple forms of corruption, creating a corrupt and complex environment dominated by internal and external extortion. This environment encourages bribery and exploitation in Gaza, resulting in economic distortions and the systematic corruption of the humanitarian work environment, which may be detected in the following ways:

1- Emergence of corruption networks: The occupation's deliberate policy, stemming from the closure of crossings and strict restrictions on the entry of goods and aid, has led to the formation of organized corruption networks involved in transportation and shipment into Gaza. Israel alone determines which merchants have the exclusive right to bring goods into the strip, resulting in monopolization and inflated prices. This has forced other merchants to pay commissions (informal payments) to these exclusive traders to bring in their goods. The head of the Gaza Chamber of Commerce, A'ed Abu Ramadan, said that around US\$330 million have been paid in commissions to coordinate goods entry into Gaza¹⁸.

Researcher Ahmad Al-Tannani notes that, "war profiteers" have always been a tool used by the occupation to reshape the business sector in Gaza. Through them, Israel has aimed to install a specific group of businesspeople as the dominant economic force in the Strip, benefiting from exclusive privileges granted by the occupation and dominating the market¹⁹.

2- Rise of Nepotism and Favoritism: Exclusive contracts with certain transport companies that have the sole right to deliver goods and aid to Gaza have increased favoritism and nepotism in transport and shipping operations²⁰. These companies are often informal family or clan-based businesses.

3- Emergence of financial embezzlement and misuse of funds: The required protection procedures for aid entry have created a fertile ground for embezzlement and theft of aid, which is later leaked into markets. The fragile security conditions imposed by Israel during the genocidal war, and the absence of prevention and security apparatus, have led to paying large sums of money to informal family-run security companies to protect aid, further encouraging aid theft and resale .

4- Lack of transparency regarding the quantities and types of aid: Because of the absence of transparency in the policies of crossings management, and not publishing standards and procedures of entry of goods and aid into Gaza, or regular reports on the crossings, identifying the types and quantities of aid and goods entering, effective planning of aid distribution becomes difficult, opening room for misuse and manipulation.

5- Absence of effective oversight mechanisms: This constitutes one of the most pressing issues during the war, because of the occupation's deliberate exclusion of any Palestinian oversight body that would regulate and document entry/exit processes at the crossings. There are no written rules binding Israel or the local and international partners to clear standards on priorities of goods or aid entry, creating a fertile environment for improvisation, favoritism, and discrimination in service provision. The Gaza Chamber of Commerce notes that goods are brought in based on merchant preferences, not market needs or Gazan community priorities, in the absence of transparent criteria or mechanisms for the entry of goods or aid²¹.

¹⁸ A'ed Abu Ramadan, previous source.

¹⁹ Ahmad Al-Tannani, previous source.

²⁰ Abdullah Sharshara, legal researcher, personal interview on 6 May 2025.

²¹ A'ed Abu Ramada, previous source.

6- Growing phenomenon of bribery and misuse of public funds: The absence of a regulatory Palestinian body to manage the relationship between merchants and international organizations has opened the door for some intermediaries to manipulate the system and accept bribes from those involved in transportation services²².

In conclusion, the practices and behaviors that developed under the occupation's administration of Gaza's crossings have engineered a complex environment of corruption, with overlapping factors creating entangled networks that are difficult to dismantle in the Palestinian context.

Occupation as a corruption institution in crossings administration:

Corruption in Gaza's crossings management goes beyond reinforcing the corrupt conduct outlined in this report. The occupation itself has become a sovereign institution monopolizing command and control of decision-making, amid an absence of legal standards or transparency in crossings management, and a lack of any official or community-based body for accountability, creating an enabling environment for abuse of power and for accepting bribes by several Israeli officers and soldiers. Numerous human rights and international reports have documented officers accepting

bribes in their duties at the crossings. The Israeli Ynet Investigations Office confirmed that Israeli officers accepted bribes related to smuggling operations and unauthorized entry²³.

The chairperson of Gaza Chamber of Commerce indicated that no one has accurate information about the criteria or mechanisms used to select merchants and transport companies, pointing out that some traders are subjected to extortion and are often forced to pay bribes to influential intermediaries who affect the decisions of the occupation authorities. Some of these actors operate outside Gaza, in the West Bank, or even inside Israel, working as brokers for the occupation in return for large commissions to expedite or permit goods entry from the Israeli side²⁴.

²² Previous source

²³ Alexander Fulbright: " 5 soldiers arrested for taking bribes to let Palestinians into Israel illegally", 8 February 2017, https://www.timesofisrael.com/5-soldiers-arrested-for-taking-bribes-to-let-palestinians-into-israel-illegally/?utm_source=chatgpt.com

²⁴ A'ed Abu Ramadan, previous source.

Key findings

The Israeli occupation authority has weaponized its absolute control over all Gaza crossings as a central tool in its systematic campaign of genocide in the Gaza Strip. This is done by completely controlling the lives of Palestinians, not only through siege, but also through an opaque, complex system replete with structural corruption and exploitation. This is manifested in the way the entry of aid and goods, and the movement of individuals is managed, through which different forms of political and economic extortion is practiced, thus exacerbating, rather than addressing, the crises of Gaza's inhabitants. The key findings of this paper can be summarized as follows:

- The occupying power uses crossings as tools for political pressure, granting or denying permits for the entry of humanitarian aid or import based on security and selective criteria, used to achieve its own security objectives, not to meet the actual Palestinian humanitarian needs.
- Aid and goods entry lacks transparency and clear standards, as entry is selective and based on merchants' preferences rather than population needs, leading to misaligned aid priorities and inequitable distribution, which encourages exploitation and corruption in management and distribution operations.
- Monopoly over population needs as a bargaining chip, as Israel, the occupying power has used basic needs (medicine, food, fuel) as a tool of political leverage, turning humanitarian needs into tools of coercion that enable the occupying power to strengthen its grip, in violation of humanitarian principles and provisions of international law.
- The Israeli policies deliberately aim to strip Palestinian institutions of any role in managing, coordinating, or overseeing crossings, aggravating the state of institutional uncertainty, and further weakening the Palestinian Authority's or other actors' ability to combat corruption or build a governance model characterized by integrity and transparency.
- The occupying power, through its management of the crossings, has instilled attitudes based on "manipulation", not the rule of law, resulting in an administrative model that is structurally irreparable under occupation.
- The control of the occupying power over crossings has severely undermined Palestinian anti-corruption capabilities and dealt a major blow to national integrity and transparency frameworks.

Recommendations, strategies, and national measures to alleviate corruption risks resulting from the occupation's management of Gaza crossings

First: At the international level

Combating the corruption of the occupation authorities in managing the movement of goods, aid, or individuals, especially patients, requires adopting effective monitoring mechanisms to ensure transparency in the occupying power's operations, in addition to detecting violations of the Fourth Geneva Convention to enable international accountability and expose abuses through various pressure tools, including strong media campaigns, to deter the occupation from using crossings as instruments of political extortion and discrimination.

This can be achieved through:

- 1. Establishing a permanent international monitoring mechanism**, supervised by the United Nations or the International Committee of the Red Cross (ICRC), to oversee the operations at Gaza's crossings and ensure they are not used as tools of collective humiliation, security blackmail, or manipulation of humanitarian aid.
- 2. Exerting pressure for activating a neutral mechanism to audit and monitor** entry of aid and goods, including issuing and publishing quarterly transparent reports detailing the volumes and types of aid, and reasons for rejection or delays.
- 3. Leveraging international advocacy efforts** to monitor and document Israeli practices that violate international law, and pursue legal action through relevant international bodies.
- 4. Condemning Israeli practices of refusing or delaying permits** for international and Palestinian humanitarian workers, and submitting formal complaints to the Human Rights Council regarding such violations.
- 5. Including occupation practices at crossings in ongoing investigations** before the International Criminal Court (ICC), as part of the systematic collective punishment policy exercised by the occupation.
- 6. Supporting the documentation of corruption and humanitarian blackmail crimes at crossings**, through funding for independent legal and research reports and ensuring these are made available to relevant UN bodies.

Second: At the local level

Confronting widespread corruption resulting from Israel's full control over Gaza's crossings requires collaboration of Palestinian national efforts, involving both formal and informal institutions. A comprehensive community culture must be cultivated to build a rational public opinion capable of resisting Israeli efforts to dismantle Palestinian social values, especially integrity, accountability, transparency, and fighting all suspicions of corruption. This requires a comprehensive national plan, based on coordinated efforts across sectors within the Palestinian context, as follows:

Activating monitoring of goods and individuals at crossings: Establish a Chamber of Commerce, Industry and Agriculture responsible for documenting the movement of goods and humanitarian

aid, gathering data from merchants and institutions, and publishing quarterly public reports. The chamber's duties include:

- Building a unified and open database of traders and companies with import permits, detailing the types and quantities of goods, and entry times. This data should be accessible to oversight bodies and civil society organizations.
- Developing a precise criteria list for humanitarian and economic priorities, to serve as a reference in dealing with the occupation and international organizations, preventing manipulation and avoiding "political selectivity."
- Adopting a standard Palestinian form to submit to the occupation for requesting the entry of goods and aid. The application form should be written, documented, and include the applicant's signature, cargo details, origin, and final beneficiaries. The Commerce, Industry and Agriculture chamber must be able to monitor and document these operations.
- Creating a blacklist of traders who violate the standards and conditions of the entry of goods and aid through the crossings.
- Notifying formal oversight bodies.

Third: At the civil society level (civil society institutions)

- Launching digital platforms for public monitoring and documentation: through mobile apps or websites that allow citizens and field workers to report corruption or manipulation in aid distribution or movement of goods.
- Forming grassroots monitoring committees at distribution centers: involving representatives of labor unions and popular committees to oversee aid distribution and document violations such as favoritism, monopolies, or aid leakage to black markets.
- Funding projects to monitor corruption related to aid and crossings by independent local organizations and developing monitoring reports accordingly.
- Publishing independent periodic reports on crossings operations based on field data and investigative reports, published and submitted to relevant authorities and UN agencies to expose sources of irregularities and promote transparency.
- Encouraging international investigative journalism to expose Israeli corruption in crossings management and present it globally, while also motivating international media to adopt this reporting approach.

Fourth: At the private sector level

- Adopting a binding code of conduct for companies and merchants, with clear provisions that prohibit bribes or dealing with unofficial intermediaries. Violators should face professional sanctions, including removal from commercial registries related to crossings.
- Creating a complaints mechanism, including those from harmed merchants. The Chamber of Commerce

should open a portal to receive complaints of harmed traders because of monopoly, extortion, or permit manipulation. These should be handled by a joint committee of Chamber representatives and official oversight institutions.

Fifth: At the level of international institutions

- Publishing regular lists of the nature of aid entering through international organizations, detailing quantities, types, entry dates, and distribution entities. This information should be posted on official websites or in press releases.
- Preparing and publishing external audit reports, subject to Palestinian community accountability, covering all transport and supply operations, especially those involving intermediaries. A copy should be submitted to the UN Office for the Coordination of Humanitarian Affairs (OCHA).
- Stopping any coordination involving unqualified or unregistered intermediaries, to block corruption based on “permit sales”.

Sixth: At the citizens’ level

- Establishing a hotline managed by the Chamber of Commerce, enabling citizens to report corruption related to crossings management.

Seventh: At the civil society level

- Activating educational programs aimed at instilling values of transparency and accountability, and linking crossings corruption to its direct impact on the citizens’ daily lives, such as high prices and medicine shortages.

Action Plan: Emergency response to combat corruption at Gaza crossings

Responsible entity	Executive Action	Urgent Priority	Level
National (Chamber of Commerce)	Control trade and logistics operations at crossings.	Establish a central oversight unit for crossings to track movement of goods and aid.	Anti-Corruption Commission + Ministry of Economy
	Transparency in supply licensing	Prepare a national, transparent authorized traders registry updated weekly	Ministry of Economy + Chamber of Commerce
	Prepare a blacklist of traders violating import standards; report to oversight bodies including relevant ministries and the Anti-Corruption Commission (ACC)	Issue a national guide to prioritize goods and aid based on Gaza's needs	Ministry of Economy + Environmental Quality Authority
Civil (Civil Society)	Popular oversight and documenting corruption Issue reports that expose the corrupt	Launch a civil electronic observatory to report corruption and violations in distribution and shipping	Civil oversight organizations + AMAN Coalition
	Governance in field distribution	Form popular committees to monitor distribution centers and relief warehouses	Civil society institutions + local councils
Private Sector	Break trade monopoly	Issue a binding code of conduct for merchants and transport companies prohibiting bribes or unofficial coordination	Chamber of Commerce + Anti-Corruption Commission
	Compulsory financial disclosure	Enforce periodic supplier reports detailing contracts and pricing	Ministry of Finance + Ministry of Economy
International (UN bodies)	Transparency in support operations	Require international organizations to publish regular reports on the types and quantities of aid	OCHA + WFP + UNICEF
	Control contracts with local companies	Require transparent contracts with local carriers including integrity and accountability provisions	UNDP + aid organizations
	Neutral audit reports	Enforce third-party external financial audits of transport operations	UN institutions + Independent auditors

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9. <https://www.hrw.org/ar/report/2024/11/14/389665>.

Interviews:

No.	Name	Title	Date of interview
1	Amjad Al-Shawwa	Director, Palestinian NGOs Network	13 May 2025
2	A'ed Abu Ramadan	Director, Gaza Chamber of Commerce	7 May 2025
3	Abdullah Shararah	Human rights researcher and writer	6 May 2025
4	Mohammad Al-Sharafi	Board Member, Al-Sharafi Transport Company	5 May 2025



AMAN was established in 2000 as a civil society organization that seeks to combat corruption and promote integrity, transparency and accountability in the Palestinian society. The Coalition was first formed by an initiative from a number of civil society organizations working in the field of democracy, human rights and good governance. In 2006, the Coalition was accredited as a national chapter for Transparency International.

AMAN is a Palestinian think tank and a specialized body providing knowledge on corruption at the local and regional level through producing specialized reports and studies. The periodic publications include: The annual Integrity and Anti-Corruption Report, the annual Palestinian Integrity Index and the National Integrity System studies and reports, in addition to the Coalition's continued contributions to produce reports and studies on the status of corruption in the Arab region.

As part of the global anti-corruption movement - and of international alliances and partnerships with relevant specialized coalitions and organizations - AMAN plays a key role in the transfer and contextualization of necessary international knowledge and tools to combat corruption in all sectors.

Website: www.aman-palestine.org

Email : info@aman-palestine.org

f @ t v in /AmanCoalition

Ramallah, Irsal St, Remawi Building , 1st floor

Tel : 2989506 2(970+) 2974949 2 (970+)

Fax : 2974948 2 (970)

Gaza-Southern Rimal - Habboush St. - Sub of Martyrs St. Dream

Tel : 082884767

Fax : 082884766