

AMAN
Transparency Palestine



Research Paper

Israeli Occupation Restrictions on International Parties Operating in the Gaza Strip and their Impact on Palestinian Civic space



Ramallah- Palestine

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List of terms

Term	Definition
Politicization of humanitarian aid	The use of humanitarian aid as a tool of political or security pressure, whereby it is geared according to political objectives rather than meeting humanitarian needs in a just and transparent manner
Dual-use materials	Materials that can be used for civilian and humanitarian purposes and also for military purposes, such as certain medical equipment, electric generators and communication devices, which results in restrictions on their entry by occupation authorities
Palestinian civic space	The space in which Palestinian civil society organizations (CSOs) operate, including associations and NGOs, which enjoys freedom to work, accountability and community participation in humanitarian and political issues
Logistical restrictions	Imposed obstacles on the entrance and distribution of humanitarian aid inside the Gaza Strip, including control over crossings, restrictions on transportation routes, prevention or delay in the entry of materials and equipment, especially those classified as dual-use, and conducting complicated inspections on trucks
Security restrictions	Arrangements justified by security restrictions by occupation authorities, including: imposing maps of ‘accessible’ and ‘inaccessible’ areas, accompanying or monitoring humanitarian convoys; restricting the movement of international and local teams; security conditions on content of trucks or the identity of local partners. These restrictions are used as a tool to control humanitarian work and lead to the politicization of aid. They also undermine the principle of neutrality and undercut the independence of humanitarian institutions and Palestinian civic space
GRM system	A monitoring or administrative system that determines procedures pertaining to humanitarian projects and materials allowed entry, which often slows down the implementation of humanitarian projects due to administrative restrictions
Administrative restrictions	Bureaucratic and organizational restrictions imposed by Israeli occupation authorities on the work of international and local institutions, including the permit system, registration and licensing mechanisms, prior approval for projects, vetting of employee and beneficiary lists, and delays in or rejection of administrative transactions
Violation of the Fourth Geneva Conventions	Breach of international obligations of the Fourth Geneva Convention on the occupying power, including facilitating the passage of humanitarian aid, the protection of civilians and safeguarding the independence of the work of humanitarian organizations

Summary

This paper will examine the impact of the restrictions and conditions Israeli occupation authorities impose on international organizations working in the field of relief and humanitarian aid in the Gaza Strip (GS) and their deep impact on all components of Palestinian civic space, throughout the ongoing genocidal war, since October, 2023. The paper reveals how humanitarian aid, which is essentially aimed at meeting the basic needs of civilians, has been turned into a tool of political and security pressure by Israel. This is done through complete control over crossings, restriction on the entry of basic materials, surveillance over the movement of institutions and their employees, and through distribution mechanisms that serve political goals at the expense of justice, governance and human dignity.

This paper analyzes the political, economic, security and logistical dimensions of these restrictions and evaluates their direct impact on the ability of international organizations to provide aid, in addition to their impact on the independence and effectiveness of Palestinian civil society in monitoring and accountability. The study is based on a descriptive, analytical, multi-source approach, combining a comprehensive review of reports and studies released by UN, international and local institutions, in addition to field interviews and focus groups with representatives of humanitarian organizations and local experts. The objective is to arrive at an in-depth understanding of the mechanisms used by occupation authorities to control humanitarian aid and determine their impact on civil society.

The findings indicate that Israel imposes a complicated system of restrictions that include security, administrative, logistical and political dimensions, which has led to constraints on the work of international institutions, thus undermining their independence and the community's trust in them. The analysis also shows that the politicization of aid has created gray spaces, which local players have exploited for personal interest and which have negatively impacted the transparency, accountability and justice in the distribution of humanitarian resources. Moreover, the paper indicates that these restrictions have led to a decrease in the operational efficiency of these institutions, an increasing dependence on local intermediaries and inequality in distribution, all of which have affected the ability of civil society to actively participate in humanitarian work.

The paper concludes that any pushback against these restrictions requires a collective, multilevel approach, including national efforts by civil society, the strengthening of independent monitoring mechanisms to ensure that aid reaches its beneficiaries, and increased international pressure on Israel to guarantee respect for civilian rights and the independence of humanitarian work. The paper reiterates the need to adopt transparent and just policies in the distribution of humanitarian aid, to ensure the protection of human dignity, the promotion of justice and restoration of civil society's trust in international institutions.

Introduction

For many years, the GS has endured unprecedented challenges due to the ongoing Israeli siege since 2007, which imposes tight restrictions on movement, trade, and basic infrastructure and contributes to the deterioration of the humanitarian and social situation for the civilian population. These challenges reached their peak with the onset of the genocide on October 7, 2025, which resulted in the widespread destruction of civilian infrastructure and the near-collapse of public service facilities. Moreover, many humanitarian organizations lost their ability to operate efficiently.

During this war, Israel imposed even tighter restrictions, including full control over crossings, restrictions on the entry of basic goods, monitoring the movement of institutions and their employees, and imposing stringent political and security conditions on the entry of local and international relief organization employees. This resulted in humanitarian aid, which is supposedly an unbiased response to humanitarian needs, being turned into a tool of political and security pressure. This also had a direct impact on the independence and efficacy of Palestinian CSOs and created clear gaps in fairness and transparency in the distribution of resources.

This paper will shed light on the effects of Israeli restrictions on the ability of international and local institutions to provide humanitarian aid, and on the monitoring and societal role of CSOs in the GS. It also demonstrates how these restrictions contributed to shrinking civic space and to creating an unstable environment for humanitarian work, accompanied by negative behaviors such as the exploitation of local middlemen and a hike in the cost of delivering aid to beneficiaries.

The significance of this paper lies in its in-depth analysis of the mechanisms employed by the Israeli occupation to restrict the work of humanitarian institutions in the GS. It focuses on the legal, political, and administrative dimensions of these restrictions, as well as their repercussions on the fairness of aid distribution and on the monitoring and accountability capacities of civil society. The paper aims to provide practical insights that contribute to promoting transparency and justice in the delivery of humanitarian aid and to minimize the repercussions of Israeli restrictions on Palestinian civic space, in order to preserve the human dignity of its beneficiaries and promote effective relief work.

Main objectives:

This research paper analyzes the conditions and restrictions imposed by the Israeli occupation on international parties working in the field of humanitarian relief in the GS, and considers the impact of these restrictions on Palestinian civic space and the ability of CSOs to work and implement accountability.

This paper does not address the technical details of relief operations or the purely logistical aspects of it, but exclusively focuses on the nature of Israeli restrictions and their impact on the work of international institutions and on the fairness and transparency of humanitarian aid access for beneficiaries in the GS.

The paper tackles these restrictions from a rights and humanitarian perspective, through the analysis of testimonies and field interviews. It showcases the challenges international and local organizations face and the direct impacts they have on the urban environment and the freedom of community work.

Secondary objectives:

- Analysis of the nature of Israeli restrictions imposed on the work of international institutions prior to and during the war.
- Evaluation of the impact of these restrictions on the ability of institutions to provide humanitarian aid fairly and efficiently.
- Study of the impact of restrictions on the role of CSOs in monitoring, accountability and participation in humanitarian work.
- Analysis of the restrictions on various levels (security, political, administrative, logistical, techni-

cal and policy).

- Arriving at practical and implementable recommendations to promote transparency and justice in aid distribution and minimizing the impact of restrictions on Palestinian civic space.

Methodology:

This research paper adopts a descriptive, analytical approach, which is the most suitable approach for studying the nature of Israeli restrictions and conditions imposed on international institutions in the GS, to analyze their complex ramifications on Palestinian civic space and on the principles of transparency and accountability in managing humanitarian aid. This approach is based on an accurate description of the existing reality through tracking the patterns of Israeli restrictions and measures before and during the genocide, followed by a qualitative and in-depth analysis of these restrictions and their political, security, administrative and logistical dimensions. They are then linked to their legal and rights context in accordance with the rules of international humanitarian law.

- Review of previous literature: This includes international and UN reports, released by the UN Office for the Coordination of Humanitarian Affairs (OCHA), World Food Programme (WFP) and the International Committee of the Red Cross (ICRC), in addition to local reports by AMAN and PNGO Network, to provide a comprehensive framework of laws and relief practices in Gaza.
- Collection of qualitative data: Direct interviews were conducted with representatives from international and local institutions to obtain in-depth insights on the nature of restrictions and challenges facing these institutions in carrying out their humanitarian missions.
- Focus groups: Two groups were convened, which included representatives from partner organizations, to discuss the reality of humanitarian work, to assess the impact of restrictions on justice and transparency and to identify the most pressing challenges in the field.
- Data analysis: Tools of qualitative analysis were used to interpret information and link it to the political and security context on the ground, which allows for an in-depth understanding of the restrictions and their impact on civic space and humanitarian institutions.
- Results and recommendations: Based on the analysis, accurate results were provided, reflecting the most significant challenges, along with proposed practical recommendations to promote transparency, justice and effective delivery of humanitarian aid to its beneficiaries.

Chapter One: Status of international organizations working in the field of relief and humanitarian aid prior to the genocide in the GS

Prior to the genocide, which began in October, 2023, international relief organizations working in the GS, operated in a complex humanitarian environment. Still, they were relatively able to carry out their missions through coordination with local authorities and specific UN arrangements. The UN, through OCHA, constituted the main coordination framework between the various agencies, including UNRWA, WFP and WHO, alongside several other NGOs.¹

In spite of the restrictions imposed by the Israeli blockade since 2007, the working environment enjoyed a certain level of operational flexibility, which gave organizations access to the most affected sectors. There were unofficial understandings that allowed the entry of food and medical supplies and facilitated the entry of aid convoys according to prior coordination with occupation authorities, via the Karem Abu Salem Crossing.²

Nonetheless, this flexibility was not without challenges. Bureaucratic Israeli measures hindered the movement of goods and international employees and curtailed the ability of organizations to devise long-term plans.

1 OCHA, humanitarian situation report on the occupied Palestinian territory, New York, 2023, pg. 6

2 WFP, Food Security Report in the Gaza Strip, Rome, 2023, pg. 9

What's more, Israel employed a policy of 'selective permits' for the entry of experts or the exit of the sick and wounded.³ Even though local organizations are key partners in the delivery of aid, their role remained limited within strict regulatory frameworks, rendering the humanitarian work environment before the war tainted by Israel's nearly complete control over the flow of resources and information.

UN reports confirm that the relief system prior to the war was structurally tenuous, given its complete dependency on foreign funding, in addition to internal political divisions and the flimsy coordination between local and international organizations. This meant it quickly collapsed once the war erupted.⁴

This point is further corroborated by an interview with Engineer Mahmoud Issa, PCRf Regional Infrastructure Program Manager, who stated that the organization faced wide-scale restrictions even before the war, most significantly being subjected to the slow GRM system and the ban on "dual-use" materials. This included medical and construction supplies, which would sometimes result in the cancellation of entire projects. He also said the geographic movement of the organization had been less restricted before the war and that the rate of approvals for foreign medical delegations via WHO had been around 90% prior to October 7, 2023. However, the movement of resident teams residing in the West Bank was more complicated.⁵

This picture is consistent with the testimony of the Director of Doctors of the World-Spain, who confirmed that the nature of restrictions before the war were concentrated on logistical aspects, especially the entry of medical equipment classified as "dual use". This led to repeated delays or a complete ban on necessary equipment. He pointed out that coordination through WHO was the key factor, which relatively helped facilitate the entry of equipment, adding that the movement of local teams remained more restricted than international teams, even though the working environment before the war was 'relatively stable', with no direct interference in the geography of health programs.⁶

Chapter Two: Status of international organizations working in the field of relief and humanitarian aid during the genocide in the GS

With the onset of the genocide on October 7, 2023, the humanitarian work environment in the GS witnessed an unprecedented collapse due to the largescale attacks on civilian infrastructure and humanitarian service centers. A number of international organizations' offices and warehouses were destroyed, including those of UNRWA, WFP and WHO, in addition to the direct targeting of field teams, killing dozens of humanitarian workers.⁷

UNRWA was subjected to a systematic process of neutralization, which sharply undermined its ability to carry out its UN mandate. According to the agency's official statements, this targeting included civilian facilities, including schools, health centers and shelters and the killing of an unprecedented number of its employees. Additionally, stringent restrictions were imposed on the movement of its teams and on the entry of fuel and basic supplies, which disrupted its operational ability at the height of humanitarian needs. These measures were accompanied by political and financial campaigns aimed at delegitimizing UNRWA and pressuring donors to suspend or cut their funding to the agency. UNRWA described this as a direct threat to its institutional existence and to its ability to provide minimum life-saving services to millions of Palestinian refugees, within a context where no other party can replace its role or fill in the vacuum left by this disruption of its mission.⁸

Organizations' operational abilities declined to their lowest levels. Only very limited channels remained for the entry of humanitarian aid, all of which were under full Israeli control through the Karem Abu Salem crossing. Meanwhile, the Rafah Crossing remained closed for long intervals, before all forms of maritime and air

3 ICRC, Restrictions on movement and their impact on humanitarian work in Gaza, Geneva 2023, pg. 3

4 PNGO, the status of humanitarian coordination in the Gaza Strip, 2023

5 Mahmoud Issa, PCRf Regional Infrastructure Program Manager, phone interview, November 7, 2025.

6 Director of Doctors of the World-Spain, phone interview, November 3, 2025.

7 UNRWA, situation report on losses among humanitarian workers in Gaza, Jerusalem, 2024, pg. 2.

8 UNRWA, humanitarian situation report No. 187, in the Gaza Strip, Gaza, 2025.

transport came to a complete halt.⁹ Furthermore, occupation authorities imposed strict security inspections on all humanitarian trucks, including those carrying medicine and food, preventing the entry of what they classify as “dual use materials”, such as water pipes, power generators and communication devices, thus leading to an acceleration of the humanitarian catastrophe and an unprecedented deterioration of the health system.¹⁰

In addition to the blockade on the ground, Israel also used a policy of systematic starvation as a means of political pressure and collective punishment, through rationing the amounts of fuel, flour and water allowed entry. This further exacerbated the suffering of the population, with UN reports showing that over 80% of the population of the GS faced acute food insecurity in the first weeks of the war.¹¹

These restrictions were accompanied by the collapse of the communications and internet system due to repeated airstrikes, which paralyzed institutions’ ability to coordinate in the field or gather data on the actual needs of the displaced. With the cut in communications between field offices and the humanitarian leadership abroad, humanitarian responses became dependent on inaccurate and limited capabilities.¹²

International reports showed that the restrictions were not only a byproduct of the war, but a deliberate policy aimed at dismantling the humanitarian structure in Gaza and preventing any organized efforts to alleviate the catastrophe.¹³ Occupation forces also interfered with determining the areas of distribution and beneficiaries, which almost completely deprived the northern and eastern areas of aid.¹⁴

Alongside the restrictions in the field, occupation authorities also resorted to the expansion of institutional administrative constraints to further undermine humanitarian work, through imposing a new system of registration and operation for INGOs, based on politically-driven, ambiguous and selective criteria. These measures threatened the ongoing work of a number of large humanitarian organizations, including health institutions, resulting, in practice, in the disruption of basic and life-saving services.

These restrictions led to the risk of nearly one-third of Gaza’s healthcare facilities shutting down, at a time when all five centers for the treatment of children with severe malnutrition are fully dependent on support from international organizations, representing the full range of treatment available for these cases inside the GS.¹⁵

Furthermore, these restrictions meant that millions of dollars of vital humanitarian supplies remained stranded outside of Gaza, including medicines, food, hygiene products and shelter supplies. This further exacerbated the already fragile health system and stymied its ability for response, at the height of tremendous humanitarian need. These measures reflect a systematic approach of using administrative measures as a means of controlling humanitarian work and undermining the right to health, and are not merely haphazard regulatory measures.¹⁶

Engineer Mohammed Issa confirmed that the war constituted a radical transformation in the nature of restrictions, whereby occupation authorities prevented the entry of almost all medical and infrastructure materials, including therapeutic baby formula. In some instances, they would condition that the organization be registered in Israel to allow the entry of limited items. Issa also pointed to a drop in the rate of approvals for medical missions to around 20%, and to the restriction on movement for foreign delegations under strict conditions, including on the duration of their stay and a ban on bringing in any personal items. He also confirmed that operations in the north and east of Gaza were almost impossible, due to Israeli maps that determined ‘safe zones’ in addition to the high costs of protecting humanitarian convoys.¹⁷

9 OCHA humanitarian situation report in Gaza, New York, 2024, pg. 5.

10 ICRC, “Restrictions on the entry of humanitarian materials to Gaza, Geneva, 2024, pg. 4

11 WFP, food security situation report in Gaza, November 2023, Rome, pg. 7.

12 Amnesty International, communication shutdown increases humanitarian crisis in Gaza, London, 2024.

13 Human Rights Watch, Targeting Humanitarian Work in Gaza, New York, 2024

14 AMAN, Report on the politicization of humanitarian aid in Palestine, Ramallah, 2023

15 Humanitarian Country Team, UN agencies and NGOs call for immediate lifting of impediments to humanitarian access and NGO operations in the OPT, UNISPAL, 17 December 2025.

16 Ibid

17 Mahmoud Issa, previous reference

An interview with Rami Bseiso, office manager at US Relief Without Borders, on November 5, 2025, showed that the organization faced difficulties in obtaining the necessary Israeli permits to enter Gaza, and were forced to rely on local partners certified by occupation authorities. He also said that inspection procedures were bureaucratic and onerous and most often resulted in the confiscation or destruction of basic materials, which were classified as ‘dual-use’.

Bseiso maintained that the imposed restrictions on the movement of international teams forced the organization to run operations remotely and to heavily depend on local partners, while focusing humanitarian response in the center and south of Gaza due to the difficulty in accessing the north.

According to Bseiso, relying on local partners and not being able to conduct field inspections, led to gaps in documentation, especially with the Israeli modifications to the content of shipments. He said this situation imposed a “working environment where ideal standards of human governance cannot be applied,” thus rendering Israeli restrictions an influential structural factor in the performance of institutions and not merely a logistic obstacle.”¹⁸

The testimony of Nadja Sorlevmo, humanitarian response coordinator at DanChurchAid, DCA/NCA corroborated this analysis. She said the war had transformed the blockade from chronic restrictions to a ‘complete suffocation’ of humanitarian work, after several key local teams were forced to halt operations due to displacement or forced exile, forcing the organization to depend on remote management. She confirmed that hundreds of shipments carrying WASH materials (water, sanitation and hygiene) remained stranded in Jordan, Egypt and Israel, awaiting Israeli permits. Dozens of requests for the entry of life-saving aid were rejected, she said, adding that the restrictions on movement and the conditions imposed by Israeli military maps for distribution routes, created vast geographic gaps that deprived areas in the north from access to relief aid.¹⁹

Moreover, the Director of Doctors of the World – Spain, said the war had led to an almost complete ban on the entry of basic medical items, including portable diagnostic equipment, emergency supplies and certain materials that need cold chains, due to the expanded ‘dual-use’ list. He confirmed that Israeli inspections had become a direct obstacle to health responses, explaining how some shipments had arrived after their expiry date or after their therapeutic value had been lost. Furthermore, movement inside the Strip became subject to security criteria determined by occupation authorities, which meant the organization’s work was confined to southern and central areas, with the impossibility of accessing areas in the north and east throughout most of the war.²⁰

Chapter Three: Challenges and restrictions imposed by Israeli occupation authorities on the work of international organizations prior to and during the genocide

International organizations in the GS face a number of key challenges imposed by Israeli occupation authorities, which can be divided into five overlapping points:

1. Security and administrative restrictions:

Israel controls the movement of goods and employees through a complicated permit system, which bars entry for a number of basic materials and delays the passage of convoys for days or weeks. Occupation authorities impose intense inspections on shipments and prevent the entry of what they consider to be ‘dual-use materials’ (such as certain generators or technical components). These measures curtail the ability of organizations to effectively operate and administratively burden them.²¹

2. Geographic and logistical restrictions

Relief corridors are largely confined to the Karem Abu Salem Crossing, which is under strict Israeli control, thus hindering the delivery of aid to the north of Gaza. Drivers are often forced to use long and circuitous roads, which increases the risk of being looted or targeted. What’s more, moving from one place to another

18 Rami Bseiso, administrative officer at an international organization, November 5, 2025

19 Nadja Sorlevmo, humanitarian response coordinator at DanChurchAid, DCA/NCA, phone interview, November 13, 2025

20 Director of Doctors of the World – Spain, aforementioned reference

21 ICRC, report on security restrictions on humanitarian access to the north of Gaza, Geneva, 2024, pg. 2.

inside the Strip is very limited, in light of the ‘security maps’ set by Israel. ²²

3. Restrictions on resources and funding

Organizations are subjected to tremendous funding pressure as a result of the difficult conditions Israel imposes on donor countries, in addition to the difficulties in renewing work permits or importing necessary equipment. This financial pressure has undermined the ability of organizations to implement long-term projects and has limited their operational flexibility. ²³

4. Technical and communications restrictions:

The restrictions on communications and internet networks in the GS were exacerbated by the bombardment, hampering coordination between field teams and main offices. Some organizations were forced to stop using digital aid tracking systems due to power outages or communication disruptions, which resulted in errors in distribution and dispersed efforts. ²⁴

5. Legal and political restrictions:

Israel imposes legal control over crossings and borders, using the justification of “security” to prevent the entry of individuals and materials, which contravenes with certain obligations of international humanitarian law. For example, Article 59 of the Fourth Geneva Convention stipulates that, “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.”²⁵

The interview with Mohammed Issa supports this analysis. He stated that the restrictions before the war were ‘institutional and slow’, but allowed for a limited ability to plan, while during the war, this turned into full paralysis, including the prevention of materials, a halt to projects and a decline in the ability to plan. After the ceasefire, restrictions did not go back to the levels prior to the war, but turned into a ‘new permanent status’ characterized by the continuous prevention of construction materials, restrictions on the entry of aid and uncertainty regarding procedures. This meant organizations were forced to repeatedly redesign projects to comply with Israeli entry regulations. ²⁶

The interview with Bseiso revealed that the phase following the ceasefire did not represent a transition to a more stable environment, but continued along the pattern of ‘systematic suffocation’, in his words. He said that from the moment the organization entered Gaza after the war began, it was met with major difficulties in obtaining security permits as a new international organization. This forced it to operate through intermediary channels such as precarious charitable societies. Bseiso maintained that the tightened restrictions on the content of shipments remained fixed, even after the ceasefire, including the continued ban on operational materials and sustainable equipment Israel classifies as ‘dual-use’. This undermined the organization’s ability to move from emergency relief to more sustainable interventions.

According to Bseiso, even though movement at crossings became more ‘routine’ after the ceasefire, the fluctuation in the opening and closing of crossings for political and security considerations was not transparent, rendering relief organizations incapable of formulating stable operational plans. Thus, the nature of the restrictions did not fundamentally change, only their rhythm, from the early chaos of war to a systematic blockade that maintains steady depletion and prevents the transition of humanitarian aid to a stage of real recovery. ²⁷

The testimony of Najda Sorlevmo aligns with this analysis. She said that while the restrictions before the war were stringent, they were still ‘plannable’, allowing for the development of long-term community programs. However, during the war, the siege was transformed into a direct military tool, through the nearly complete closure of crossings, the stagnation in the entry of goods, and the targeting of humanitarian infrastructure.

22 OCHA, Restriction on humanitarian access to northern Gaza, New York, 2024, pg. 6

23 UNDP, humanitarian funding in Palestine during armed conflicts, New York, 2023, pg. 9

24 AMAN, Transparency report on the use of technology in humanitarian work in Palestine, Ramallah, 2023.

25 Fourth Geneva Convention, Protection of Civilian Persons in Times of War, Article 59, Geneva, 1949.

26 Mahmoud Issa, aforementioned reference

27 Rami Bseiso, aforementioned reference

After the ceasefire, no breakthrough occurred, only a new phase of ‘reengineering the system of humanitarian access’ with even stricter conditions. This included the continued rejection of aid requests, disruption in the entry of millions of shelter materials and threats to international organizations to halt their work if they did not comply with Israeli political or security conditions.²⁸

Moreover, Director of Doctors of the World- Spain, maintained that after the ceasefire, the restrictions turned into a pattern of ‘operational siege’, which prevented the recovery of the health system. He said the ban list remained extensive, with delays in the entry of alternative energy sources, spare parts and heavy equipment necessary for the sustainability of primary care facilities. He said occupation authorities do not directly interfere in patient lists, but in practice, they control what materials are allowed, and therefore the services the institution can and cannot provide, thus constituting a form of indirect control over the priorities of healthcare work.²⁹

Chapter Four: Impact of Israeli restrictions on the system of transparency and accountability in humanitarian aid management

Israeli restrictions on international organizations in the GS directly undermined their capacity to fulfill core functions, including ensuring the fair and transparent delivery of humanitarian aid. Relief work went from independent humanitarian activity to a process subjected to Israeli oversight and political and security control, which undermined the people’s trust in the integrity of the distribution process. This exacerbated inequalities in the access to aid.³⁰

1. Impact of restrictions on fair distribution

Occupation authorities imposed specific areas of distribution, in accordance with their security considerations, which led to vast areas being denied aid. The distribution process became subject to Israeli criteria instead of those of humanitarian needs, which resulted in clear discrepancies between affected sectors.³¹ A WFP report indicated that the northern areas of the Strip only received 10% of overall aid that entered through crossings in the first three months of the war.³²

Mahmoud Issa said in his interview that restrictions during and after the war greatly impacted the standards of integrity and transparency in international organizations, maintaining it is difficult to ensure geographical justice in distribution, especially in northern Gaza. He said restrictions on the movement of teams created gaps that could be exploited by middlemen, also saying that the stipulation on organizations to register in Israel meant they were obligated to provide lists of employees and beneficiaries to Israeli parties, something the organization refused to comply with in preservation of its independence.³³

Meanwhile, Rami Bseiso said the intervention map was never based on actual needs but on access areas, which deprived the population of northern Gaza in particular, of accessing equal aid. He explained that relying on local partners as a result of restrictions on the movement of staff created clear gaps in verifying beneficiary lists and preventing duplication, with individual biases or misuse emerging in some areas. What’s more, the overlapping roles of several organizations in the central and southern areas increased the possibility of duplication for some families, while others remained without aid in besieged or dangerous areas. This undermined the population’s trust in international organizations.³⁴

Sorlevmo confirmed that Israeli control over aid routes created clear geographic injustices, explaining how several areas outside the scope of humanitarian coverage were left out, resulting in the decline of community trust in international organizations and their Palestinian partners. She said refusal of aid entry, pressure on

28 Najda Sorlevmo, aforementioned reference

29 Director of Doctors of the World – Spain, aforementioned reference

30 OCHA, aforementioned reference, pg. 4

31 ICRC, Restrictions on the movement of humanitarian aid in Gaza, Geneva, 2024, pg. 3

32 WFP, Food Security Report – Gaza, 2024 first quarter report, Rome, 2024, pg. 6

33 Mahmoud Issa, aforementioned reference

34 Rami Bseiso, aforementioned reference

some organizations to accept certain political conditions, and the exclusion of local partners, under the pretext of ‘security classifications’ were all factors that contributed to the corrosion of civil society’s independence and the transformation of some local organizations into ‘secondary executers’ instead of independent actors.³⁵

Doctors of the World-Spain Director, confirmed that Israeli restrictions meant medical services were concentrated in central and southern Gaza, with northern areas being deprived of primary healthcare services for long periods of time, ultimately causing geographic injustice in the provision of services. He maintained that increasing reliance on local partners for data gathering and implementing activities, due to poor access, created higher risks for duplication and deviation. It also undermined the ability for direct auditing, which in turn, impacted the community’s trust in international organizations.³⁶

2. Impact of restrictions on transparency and accountability

According to Bseiso, the restrictions on the movement of teams and bans on access to certain areas, limited the ability of organizations to conduct field monitoring, which allowed for the seepage of relief supplies and the creation of fertile ground for obscure practices. He said these restrictions exacerbated the corrosion of Palestinian civic space, whereby local organizations were preoccupied with survival and response instead of their natural role of oversight and community initiatives.³⁷

Sorlevmo confirmed that Israeli restrictions and the coercion of some organizations to accept certain political conditions, led to a setback in the independence of local civil society, turning some organizations into a secondary tool for aid distribution.³⁸

Director of Doctors of the World-Spain, pointed out that continued restrictions on aid and teams have trapped local organizations between donor requirements and a system of siege, which has resulted in the corrosion of the independence of civic space and weakened the ability for direct oversight and evaluation.³⁹

3. Impact on operational efficiency

Logistical restrictions led to a hike in transportation prices and a setback in the speed of humanitarian response. Massive resources were depleted in security and administrative coordination instead of the actual distribution of aid, while organizations were forced to rely on indirect distribution channels through local intermediaries, which increased the likelihood of wasting and weakening efficiency.⁴⁰

4. Impact on Palestinian civic space

Israeli restrictions weakened civic space in the GS by undermining the independence of CSOs and reducing their role in humanitarian work. Many CSOs were excluded from distribution processes or their participation was limited to secondary tasks.⁴¹ This situation led to the corrosion of mutual trust between international and local parties and weakening the community’s ability for initiative in the face of crises.⁴²

5. Legal and rights dimension

These restrictions constitute a clear violation of international humanitarian law, which obliges the occupying power to facilitate access to aid to the civilian population without bias. Article (59) of the Fourth Geneva Convention stipulates that, “parties to a conflict are obligated to allow the passage of humanitarian aid when

35 Najda Sorlevmo, aforementioned reference

36 Director of Doctors of the World – Spain, aforementioned reference

37 Rami Bseiso, aforementioned reference

38 Najda Sorlevmo, aforementioned reference

39 Director of Doctors of the World – Spain, aforementioned reference

40 UNDP, The cost of humanitarian work in a restricted environment: the Gaza Case, New York, 2023, pg. 9

41 United Nations Human Rights Office of the High Commissioner (OHCHR). “Civil society and civilians must be protected in ‘harrowing’ Gaza”. Statement, 3 April 2024.

42 Human Rights Watch, Aid Restrictions and Civil Space in Gaza, New York, 2024.

there is urgent need.”⁴³ Human rights organizations considered Israel’s measures to be collective punishment, amounting to a war crime.⁴⁴

Results and recommendations

Field data and international reports revealed that Israeli restrictions on the entry of goods, the movement of teams and the management of crossings, constitute a system of deliberate siege where humanitarian aid is used as a political and security tool of pressure, not just a byproduct of the war or for security or technical considerations. This is evident in the expanded list of materials classified as ‘dual-use’, the disruption in the entry of medical supplies and infrastructure, communications and energy materials, along with the rejection of dozens of requests to bring in life-saving aid, even during such an acute humanitarian crisis.

Furthermore, field data and testimonies from international organizations contributing to this paper, demonstrated how the politicization of aid constituted one of the most jarring impacts of these restrictions. Aid was used as a tool of political and security leverage, which had a direct impact on just access to it.

The absence of a unified national registry for eligible categories and the weak coordination between international and local organizations working in aid distribution, resulted in the emergence of patterns of bias and inequality among beneficiaries. It also led to duplication in aid for some groups while other, more affected groups, were excluded.

This reality contributed to weaker transparency and a clearer trust gap between the community and distribution parties. It also paved the way for unregulated practices, due to the absence of standardized systems of documentation and accountability.

In this context, the paper demonstrates that international institutions operating in the GS justify their lack of real leverage to confront or challenge these conditions. They argue that any objection or refusal to comply could lead to broader disruptions or even a complete halt of vital health, relief, and shelter activities, maintaining that such an outcome would pose a direct threat to civilian lives. These organizations found themselves facing an enforced equation, of either continuing to provide minimum humanitarian services under unjust restrictions, or taking the risk of losing the ability to operate altogether. This limited their ability to have any structural impact within the system of restrictions, keeping their interventions limited to managing the crisis instead of changing its conditions. Following are the paper’s key findings:

1. The transformation from “plannable” restrictions before the war, to a state of “operational suffocation” during and after the war.

Testimonies from representatives of international organizations showed that the working environment prior to October, 2023 was restricted, but relatively stable and plannable. After the war, it became almost completely paralyzed in supply and movement. This was followed by the ceasefire and the ‘new and concerning permanent situation’ characterized by maintaining restrictions as a tool of control, including the scope and nature of humanitarian interventions, therefore preventing the shift from emergency relief to recovery and reconstruction.

2. Undermining of geographic justice and creating severe gaps in the access to aid.

Israeli restrictions on movement and on the map of ‘accessible areas’ led to vast areas, especially in the north and east of the GS, being excluded from aid and medical services for lengthy periods of time. The distribution of aid was determined, in practice, according accessibility of areas, not according to any needs-based criterion. This created a situation devoid of any clear geographic justice and further entrenched the gap between various areas of the Strip.

3. Corrosion of transparency and accountability in managing humanitarian aid

The decreasing ability for direct field inspections, along with organizations being forced to increasingly rely

43 Fourth Geneva Convention, protection of civilians in times of war, Geneva, 1949, Article 59.

44 Amnesty International, Gaza: Humanitarian Blockade Violates International Law, London, 2024.

on local partners and intermediators under such turbulent conditions, led to an increased risk of bias, duplication and misuse and also weakened monitoring and evaluation systems. The restrictions also created a gap between declared project plans and what could actually be implemented, which negatively impacted the community's trust in international organizations and their local partners.

4. Weakened Palestinian civic space and diminishing independence of CSOs

Israel's control over crossings, the refusal of so many requests by international organizations and the indirect pressure to choose local partners, resulted in many Palestinian organizations shifting from independent actors to 'secondary executors' of externally designed projects. Restrictions have undermined the ability of these organizations to exercise their natural role of community oversight, accountability and advocacy, in favor of keeping them constantly preoccupied with attempts to survive and respond under siege.

5. Systematic violations of international humanitarian law and human rights

Evidence indicates that the restrictions imposed on the entry of goods and the use of starvation and collective punishment, constitute a flagrant breach of the occupying power's obligations according to the Fourth Geneva Convention, particularly Article 59. They also amount to war crimes pertaining to the use of starvation as a tool of war and the targeting of humanitarian work and civic space.

Recommendations

The findings of this paper show how the system of Israeli restrictions has created clear gaps in coordination, governance and justice in aid distribution and has undermined the oversight role of civil society. Based on these observations, following is a presentation of practical recommendations, aimed at promoting transparency and minimizing the impact of these restrictions on humanitarian work and Palestinian civic space.

1. Establishment of a national humanitarian coordination platform, as politically independent as possible

Including international organizations, key Palestinian organizations, unions and technical government parties.

Standardizing targeting criteria and the distribution of roles to minimize any interferences of an exclusionary or discriminatory nature, due to factional or tribal interferences, to ensure fair distribution.

2. Promoting the oversight and evaluation role of civil society

Forming community committees to review beneficiary lists and monitor complaints or notifications of any bias or corruption.

Capacity-building for local organizations in governance and financial management to ensure greater independence.

3. Unifying and protecting data

Setting up a unified database for beneficiaries with clear criteria for transparency and data protection, to minimize duplication and exclusion.

4. Adopting a joint code of conduct and clear mechanisms of accountability

Obliging all parties to release basic information to beneficiaries regarding programs, funding, targeted areas and selection criteria.

5. Maintaining the neutrality of humanitarian work and separating it from the political dimensions of the blockade

• Working to completely separate between the objectives of aid and political considerations, while setting into motion international mechanisms of accountability.

6. Developing a holistic multilevel approach

Combining legal, diplomatic and political efforts to minimize the impact of restrictions, while promoting communication between local and international communities, in order to ensure consistent and sustainable humanitarian response.

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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.

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