



Study on:

CORRUPTION RISK MANAGEMENT IN PROCEDURES FOR ISSUING AND GRANTING PALESTINIAN CERTIFICATES OF ORIGIN

Report No. 330





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OF ORIGIN**

2026



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1. Introduction

Certificates of origin play an important role in global trade governance. As legally recognized documents, they establish the identity of goods and determine whether those goods are eligible for the customs exemptions or facilitation provided under international agreements. Their importance is not limited to economic considerations; they also help protect products and goods against falsification and establish the resulting legal responsibilities¹.

In the Palestinian context, certificates of origin take on exceptional sovereign and economic significance because of the restrictions imposed by the Israeli occupation and the complex challenges they create. For the Palestinian economy, a certificate of origin is more than a document used to move goods across borders: it is a strategic tool for protecting the “economic identity” of Palestinian products, ensuring fair access to foreign markets, and preventing any unlawful use of the “Made in Palestine” label. Examining the legal framework governing these certificates is therefore an essential step toward strengthening the resilience of the Palestinian economy and enhancing its credibility internationally.

Given this importance, it is unsurprising that corruption risks in certificate-of-origin procedures are a particular concern for the Coalition for Integrity and Accountability (AMAN). AMAN’s approach is based on the principle that corruption is best prevented through measures taken before misconduct occurs, rather than after the fact. Conducting this study, “Corruption Risk Management in Procedures for Issuing and Granting Palestinian Certificates of Origin,” is therefore consistent with AMAN’s approach and its 2026 strategic plan².

The study also extends its sincere thanks to the Ministry of Agriculture and the Ministry of National Economy for the cooperation, openness, and patience they demonstrated throughout the research process. Ministry staff showed no reluctance, reservation, or dissatisfaction when asked to respond to questions or participate in one-on-one interviews, enabling the researcher to complete the study.

1 Pérez Azcárraga, Augusto. 2022. Customs Matters: Strengthening Customs Administration in a Changing World. International Monetary Fund, p. 50.

2 For more information, see AMAN’s 2025 Strategic Plan, “Partners for Integrity in Governance and Strengthening Accountability,” AMAN, 2023: http://mail.aman-palestine.org/cached_uploads/download/2023/03/07/aman-2025-strategic-plan-arabic-final-1678185166.pdf

2. Methodological Framework

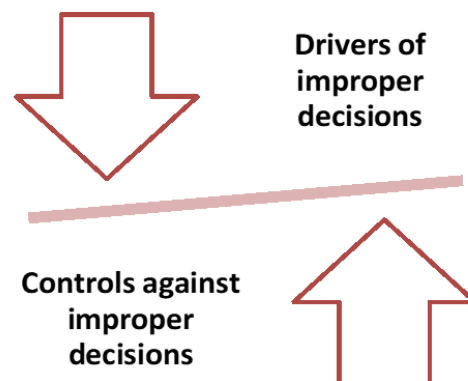
2.1 Steps Followed in Preparing the Study

This study seeks to identify and assess corruption risks in the issuance of Palestinian certificates of origin for agricultural and industrial products, and then to propose the measures needed to address those risks or transform them into opportunities to develop the agricultural and industrial sectors.

This type of study necessarily involves a degree of uncertainty and does not allow for absolute conclusions. Identifying corruption risks does not necessarily require conclusive evidence that corruption has occurred. Rather, it involves assessing the regulatory and institutional environment governing the target sector and identifying weaknesses in its procedures. Accordingly, this study seeks to reduce uncertainty and increase the reliability of its findings by applying the United Nations Development Programme (UNDP) methodology for corruption risk management, which analyzes decision points through the following steps:

First. Assessing corruption risks: This involves (a) identifying the decision tree that affects workflow in the departments under review and identifying the authority responsible for the decision; (b) identifying the forms that deviations in administrative decisions may take; and (c) analyzing the likelihood of such deviations and assessing their impact if they occur³.

The likelihood of an improper or deviating administrative decision is assessed by analyzing the drivers that increase the likelihood of such a deviation and, conversely, the controls that make it less likely to occur⁴.



The impact of corruption on an administrative decision, if it occurs, is assessed against criteria that include, but are not limited to, financial harm to both the state and citizens; damage to an institution's efficiency, effectiveness, reputation, and public trust; the erosion of citizens' rights to equitable resource allocation and equal opportunities; and the quality of services received by individuals or companies. Deviations in administrative decisions may also have adverse implications for state sovereignty or for the environment in Palestine.

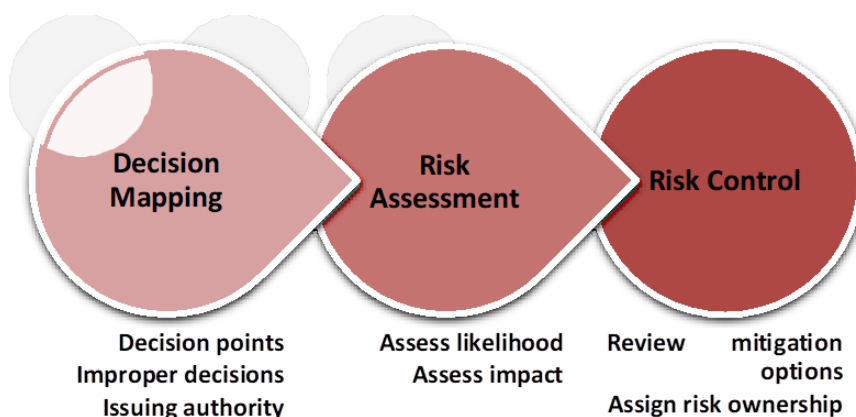
3 Andy McDevitt. 2011. Corruption Risk Assessment: Topic Guide. Transparency International. https://knowledgehub.transparency.org/assets/uploads/kproducts/Corruption_Risk_Assessment_Topic_Guide.pdf

4 Commonwealth Fraud Prevention Centre (CFPC). 2023. Conduct a Fraud and Corruption Risk Assessment. <https://www.counterfraud.gov.au/access-tools-and-guidance/conduct-fraud-and-corruption-risk-assessment>

Second. Controlling corruption risks: Once the corruption risks that may arise in certificate-of-origin procedures have been assessed, the second step is to examine and discuss available reform options to prevent corrupt acts or reduce their adverse effects. The study is expected to present recommendations centered on two core objectives: protecting employees from situations that could give rise to suspicions of corruption, and strengthening integrity in the institution's working environment.

Figure 1 outlines the steps used in this study to assess corruption risks and the measures used to control them.

Figure 1. Steps for Assessing and Managing Corruption Risks



2.2 Research Methodology and Tools Used in the Study

To achieve its objectives, the study used a combination of research methods. It applied a dual analytical approach, combining inductive and deductive methods, and used the descriptive method to map the workflows followed by the departments covered by the study. It also employed a comparative approach, particularly when examining the solutions and interventions needed to reduce the likelihood of institutional misconduct or mitigate its impact if it occurs.

The study used the following research tools to collect relevant information and data:

- **Semi-structured interviews:**

The study conducted a number of individual interviews with heads or employees working in the ministries covered by the study. The interviews were conducted in person and lasted approximately 60 minutes. A total of 6 interviews were conducted.

2.3 Study Limitations

- This study does not attempt to cover every administrative decision point arising in the work of the relevant departments and units. Not all administrative decisions carry the same level of significance. It is therefore more appropriate to exclude decisions that are merely “declaratory” in nature and focus on “constitutive” administrative decisions that create or alter legal status.
- The study focuses on corruption risks in the issuance of Palestinian certificates of origin. Procedures for dealing with foreign certificates of origin, and their implications for import and re-export procedures, fall outside the scope and focus of the study.
- Local certificates of origin issued for the movement of goods and products from the West Bank to the Gaza Strip are also outside the scope of this study. The use of such certificates is a temporary measure resulting from the fragmentation of Palestinian territory through measures imposed by the Israeli occupation, which we hope will end once the latest Israeli aggression against our people in the Gaza Strip comes to an end.
- The study is limited to procedures for issuing certificates of origin in the West Bank and the occupied Jerusalem District. It therefore does not cover the procedures that were followed in the Gaza Strip, which is currently devastated by the Israeli aggression, because of the difficulty of accessing data and communicating with ministry personnel in the Strip.

3. Conceptual and Legal Framework for Issuing Palestinian Certificates of Origin

3.1 The Multiple Dimensions of Certificates of Origin in Palestine

Palestinian certificates of origin are of major economic importance because many industrial and agricultural products benefit from preferential customs treatment in a number of countries under the international and regional trade agreements concluded for this purpose. A certificate of origin is both a legal and commercial instrument that reflects the national identity of a product. Given the Israeli economic restrictions imposed on the Palestinian agricultural and industrial sectors, Palestinian products face difficulty competing with Israeli industry in terms of production costs, production scale, and technology. Preferential trade agreements are therefore essential to sustaining Palestinian production and enabling access to foreign markets.

At the national level, the particular complexity of the Palestinian situation under the Israeli occupation gives certificates of origin for Palestinian products an important national and political dimension. Palestinians—both institutions and individuals—recognize the economic and national value of domestic products; they also understand the risks associated with labeling goods originating from the occupying power as “Made in Palestine,” a practice that misleads consumers and harms the national economy.

Many individuals and organizations worldwide make a concerted effort to purchase Palestinian products to support the Palestinian people and bolster their steadfastness; consequently, ensuring the authenticity of a product's origin becomes a pressing national necessity—as well as a tool for struggle, resilience, and resistance.

3.2 Legal Framework Governing the Issuance of Certificates of Origin in Palestine

The issuance of certificates of origin in Palestine is governed by a multi-sector legislative framework, with several official and non-official bodies involved in regulating, issuing, and overseeing certificates of origin.

At the outset, the Consumer Protection Law requires products to comply with mandatory technical regulations governing the nature and type of the product, its essential specifications and components, and packaging and labeling requirements. These requirements include product identification information such as the date of manufacture and expiry date, source or origin, and other relevant mandatory information⁶.

⁵ Articles 4 and 10 of Decree-Law No. 4 of 2010 on the Prohibition and Combating of Settlement Products.

⁶ Article 7 of Consumer Protection Law No. 21 of 2005.

In the manufacturing sector, the Palestinian legislature, under the Law on the General Union of Palestinian Industries and Specialized Industrial Unions, granted these unions a mandate to coordinate with the competent authorities on the issuance and approval of certificates of origin⁷. Under the Customs and Excise Law, the legislature also established punitive provisions prohibiting traders or manufacturers, whether inside or outside Palestine, from manipulating marks indicating origin in a way that falsely suggests that a product originates in Palestine⁸.

Decree-Law No. 10 of 2011 on Industry also grants the Ministry of Industry authority to approve certificates of origin for locally manufactured goods. It further requires information in the industrial registry to remain confidential and prohibits its publication except in cases provided for by law⁹.

At the level of secondary legislation, the study identifies a regulatory gap in the rules and regulations governing certificates of origin. Certificates are issued on the basis of written administrative procedures, but these procedures are not always published, potentially affecting transparency, legal certainty, and consistency in administrative practices among the competent authorities.

7 Article 5 of Law No. 2 of 2006 on the General Union of Palestinian Industries and Specialized Industrial Unions.

8 Articles 36, 60, and 151 of Customs and Excise Law No. 1 of 1962.

9 Articles 5 and 13 of Decree-Law No. 10 of 2011 on Industry.

4. Identifying and Assessing Corruption Risks in Granting Palestinian Certificates of Origin

Definitions of corruption in legal and social scholarship vary depending on the context and sector concerned. One widely used definition, cited by Transparency International, describes corruption as “the misuse of public authority for private gain.”¹⁰ For purposes of this study, corruption exists where the means used are unlawful and/or the objective or motive behind misuse of a public office or the authority granted to a public employee is illegitimate¹¹. This is consistent with the common core of the various forms of corruption recognized under Palestinian legislation, which consists of two principal elements: (1) abuse of authority or violation of the law; and (2) obtaining a material or non-material personal benefit¹². An effective assessment of corruption risks therefore requires a clear process-flow map for issuing and granting certificates of origin to both agricultural and industrial exporters.

4.1 Process Flow for Granting Palestinian Certificates of Origin

Applications for certificates of origin are reviewed and examined by several governmental and non-governmental bodies. The applicable procedures vary according to the nature of the product and the competent authority, particularly depending on whether the product is agricultural or industrial. Accordingly, the requirements for issuance also differ. The main steps are outlined below.

4.1.1 Process Flow for Reviewing and Granting Palestinian Certificates of Origin to Agricultural Exporters

- An agricultural exporter must first be registered with the General Directorate of Customs and Excise at the Ministry of Finance and hold a “Foreign Trade Transaction Card.” The exporter must then obtain a certificate from the Ministry of Agriculture confirming that the product is Palestinian.
- For this purpose, the farmer or trader must submit an application to the Agriculture Directorate in the relevant governorate, specifying the types of agricultural products and the quantities expected to be produced for export.
- A specialized committee from the governorate’s Agriculture Directorate conducts an on-site inspection of the crops before harvest or during sorting, packing, or loading for shipment, in order to verify the type and quantity of the agricultural goods. Based on the inspection, the Director of the Agriculture Directorate in the governorate approves the trader’s or farmer’s application for a certificate of origin by issuing a Packing List.
- The trader or farmer then goes to the Ministry of Finance to obtain a “value-added tax (VAT) invoice” in accordance with the system governing fees on local products.
- The farmer or exporter then applies to the Chamber of Commerce and Industry in the relevant governorate for a certificate of origin, presenting all of the documents listed above and completing the undertaking form required by the chambers of commerce. The certificate-of-origin application itself is completed through the Chamber of Commerce and Industry’s online portal, while the supporting documents are submitted in hard copy to the responsible chamber official. The applicant must also complete a “Packing List” form and provide an invoice stating the quantities, prices, and intended destination of the products.

10 Transparency International. 2018. “What Is Corruption?” <https://knowledgehub.transparency.org/guide/topic-guide-on-political-corruption/5203>

11 Rabia, Fadi. 2018. Police Corruption in Palestine: Challenges and Remedies. PhD Thesis, University of New South Wales, Australia. <http://hdl.handle.net/1959.4/60177>

12 Article 1 of Anti-Corruption Law No. 1 of 2005, as amended.

- The Chamber of Commerce and Industry in the governorate archives certified true copies—and, in some cases, originals—of the required documents and supporting materials.
- The applicant must obtain a health certificate from the Ministry of Health. In certain exceptional cases, the competent body is the Palestine Standards Institution. The exporter must present this certificate to the Palestinian side at crossings and borders.
- The farmer or exporter submits the certificate of origin to the Ministry of National Economy for final approval. A copy of the stamped original invoice is retained in the Ministry's records.
- The farmer or exporter informs the relevant Ministry of Agriculture directorate of the export date. The directorate then monitors the loading of the goods and issues the exporter a phytosanitary certificate through the Plants and Agricultural Quarantine Department in the governorate directorate.

4.1.2 Process Flow for Reviewing and Granting Palestinian Certificates of Origin to Industrial Exporters

- An exporter must obtain a Local Product Cost Calculation Form from the Industrial Development Department at the National Economy Directorate in the governorate. If goods are being exported from the factory for the first time, the exporter must also obtain a document confirming the exporting factory's readiness.
- The exporter then goes to the General Directorate of Customs and Excise to obtain a copy of the invoice and must present the following:
 - A duly issued invoice in accordance with the system applied by the Ministry.
 - A Packing List from the National Economy Directorate in the governorate where the factory is located.
 - The Cost Calculation Form.
- The exporter then goes to the chamber of commerce in the governorate to obtain a certificate of origin after presenting all of the above documents.
- The exporter obtains the Ministry of National Economy's approval of the certificate of origin and submits a copy of the original invoice for retention by the Ministry.

4.1.3 Process Flow for Granting Certificates of Origin for Dates

Procedures for obtaining certificates of origin for dates in Palestine differ from those applying to other agricultural products. This may be due to the large share of Palestinian exports represented by dates: production reached approximately 25,000 tons in 2025¹³, domestic consumption is approximately 6 tons, and the remaining quantity is exported to approximately 32 countries worldwide¹⁴. Interest in this sector may also be linked in part to the issue widely reported in the media as "date laundering," which AMAN exposed in its 2022 annual report and which was accompanied by serious allegations of suspected corruption and irregularities in the issuance of certificates of origin for dates.

The process for issuing certificates of origin for dates includes an additional regulatory and oversight mechanism: the Higher Committee for Estimating Date Production, established by the Ministry of Agriculture. Its members include representatives of the Ministry of Agriculture, the State Audit and Administrative Control Bureau, the Farmers' Union, the Palm Farmers Cooperative Association, the Jericho and Jordan Valley Governorate, and the security agencies.

¹³ Official website of the Palestinian Ministry of Agriculture: <https://www.moa.pna.ps/ar/news/ozar-alzraaa-antag-altmor-alfstyny-lmosm-2025-ykdr-b-253-alf>

¹⁴ Palestine Economy Portal. 2020. Online magazine: <https://www.palestineconomy.ps/ar/Article/17521>

The committee estimates actual annual date production and sets the export quota allocated to each farmer or trader. These estimates form the basis for issuing certificates of origin for dates. Exports exceeding the approved quota are not authorized. The purpose is to align exported quantities with actual production and reduce the risk of certificates of origin being issued for unjustified quantities or quantities that do not reflect genuine Palestinian production.

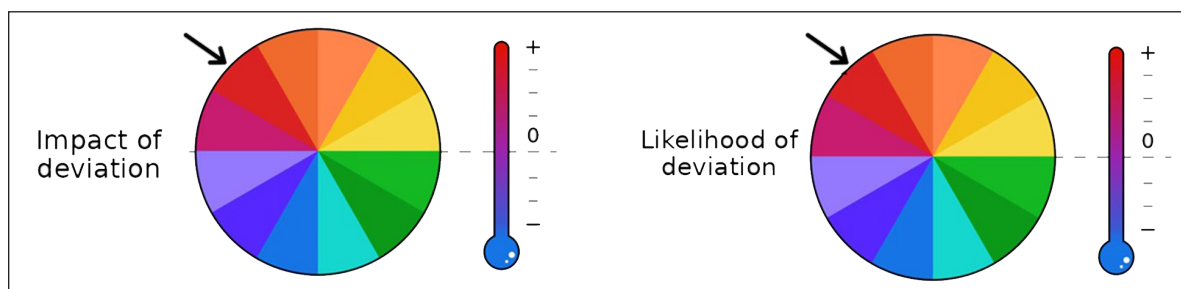
4.2 Assessing Corruption Risks in Granting Palestinian Certificates of Origin

4.2.1 Assessment of Procedures for Granting Certificates of Origin to Agricultural Exporters

Decision Point No. 1: One corruption risk is that the competent committee may fail to conduct the required field inspection yet still approve the issuance of a Packing List, contrary to established procedures. Another possible deviation is that the committee conducts the field inspection but approves the request even though the actual quantity or type of crops does not match the quantity or type intended for export. This may result from collusion between certain Ministry of Agriculture employees and the farmer or trader in exchange for a personal benefit or gain.

Current conditions may also create practical challenges for Ministry of Agriculture directorates in the governorates. A failure to conduct a field inspection does not necessarily result from collusion for personal gain; understaffing within the directorates and the lack of transportation needed to carry out field oversight are additional challenges affecting certificate-of-origin procedures. In many cases, moreover, the field inspection is conducted by a single employee rather than by a committee composed of several directorate employees.

For the reasons outlined above, the likelihood of the deviation described above can be considered relatively high. Its impact would also be high because the field inspection is one of the most important initial steps in the process and serves as a basis for issuing the certificate.



Decision Point No. 2: A corruption risk may arise when a chamber of commerce official issues a certificate of origin to a farmer or exporter despite the applicant's failure to provide all required documents, as a result of collusion with the farmer or exporter for personal gain.

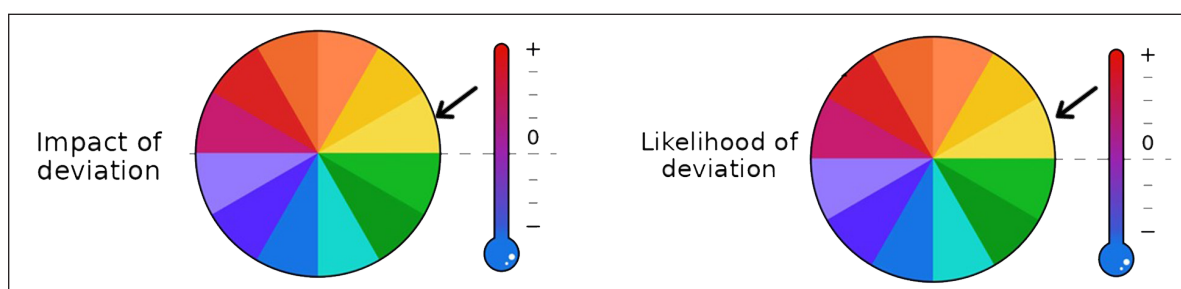
There is no unified electronic automation system across all chambers of commerce and industry. While certificates of origin issued by some chambers are entered and stored electronically, other chambers do not consistently enter or archive these documents electronically. File-retention practices also vary: some chambers retain only certified paper copies, while others keep and archive original documents and supporting materials after providing copies to the applicant. These differences reflect the absence of a unified system or procedures manual governing the issuance of certificates of origin across the chambers of commerce and industry. There is also no electronic

linkage between the chambers and the relevant ministries¹⁵, which makes the likelihood of decision-making deviations relatively high.

Although certificates of origin are subsequently reviewed and examined by the Ministry of National Economy before receiving final approval, this oversight does not eliminate the risks entirely. Some traders may use certificates of origin issued by chambers without obtaining the Ministry's final approval, taking advantage of the Palestinian state's limited control over crossings and borders. In addition, an importing entity abroad may treat the stamp of a Palestinian chamber of commerce and industry as conclusive proof that a certificate is valid, and may therefore treat goods as being of Palestinian origin even when this is not the case.

A further risk is that the same supporting documents may be used to obtain more than one certificate of origin through different branches of the chambers of commerce and industry in the governorates, taking advantage of the absence of a unified electronic system linking those chambers. This gap prevents chambers from determining whether documents have already been used or detecting duplication and manipulation, weakening the effectiveness of the oversight system and increasing the risk of misuse of certificates of origin.

The impact of such a deviation can be considered medium. On the one hand, a certificate issued by a chamber of commerce requires final approval from the Ministry of National Economy, which has the authority to verify that the documentation is complete and to refuse approval if any deficiency or violation is identified. On the other hand, in some cases the mere issuance of a certificate of origin by a chamber of commerce and industry without fulfillment of the applicable requirements may be sufficient to facilitate manipulation and misrepresentation, as noted above.

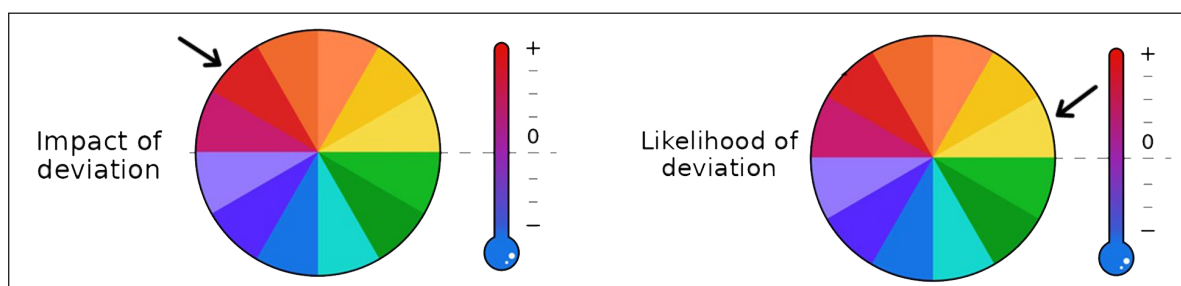


Decision Point No. 3: As noted above, after a farmer or exporter obtains a certificate of origin from a chamber of commerce, the next step is to obtain the approval of the Ministry of National Economy. A deviation may occur if the responsible Ministry employee grants final approval even though the certificate does not meet the applicable requirements or is missing required documentation, or despite knowing that information in the certificate is inaccurate, as a result of collusion with the farmer or exporter or for personal gain. A deviation may also take the form of an inadequate review of the documents or overlooking inconsistencies or inaccurate information concerning the origin or quantity of the goods.

The likelihood of such a deviation can be considered medium. Final approval is a critical stage in the certificate-of-origin process, and the responsible employee exercises discretion when reviewing and approving documents, which may create an opportunity for misconduct. At the same time, the approval process is reviewed by the responsible employee, while final approval is granted by the Director of the Import Department. This provides an internal control that reduces the likelihood of a deviation occurring or passing undetected.

¹⁵ Interview with Ms. Waseela Mahmoud, Director of the Trade Promotion Department, Ramallah and Al-Bireh Chamber of Commerce and Industry, conducted on 22/7/2026.

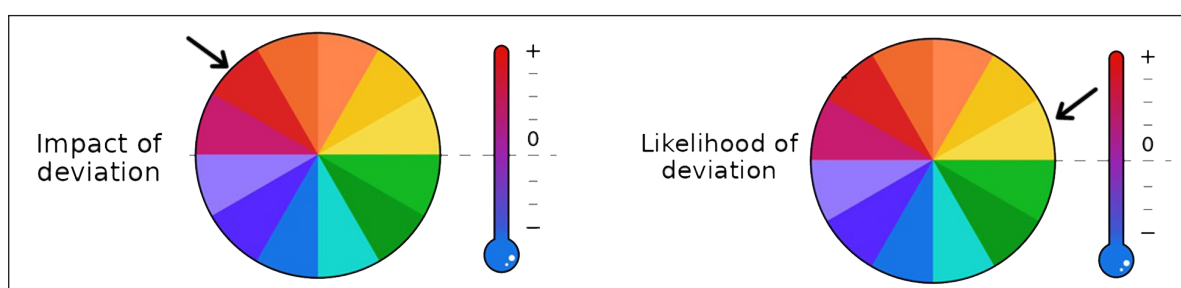
The impact would be high if such a deviation occurred because final approval by the Ministry of National Economy gives the certificate of origin its legal validity. A certificate issued on the basis of inaccurate information could allow ineligible products to receive preferential treatment, undermine the credibility of the certificate-of-origin system and the reputation of Palestinian products, and cause resulting financial and commercial harm.



4.2.2 Assessment of Procedures for Granting Certificates of Origin to Industrial Exporters

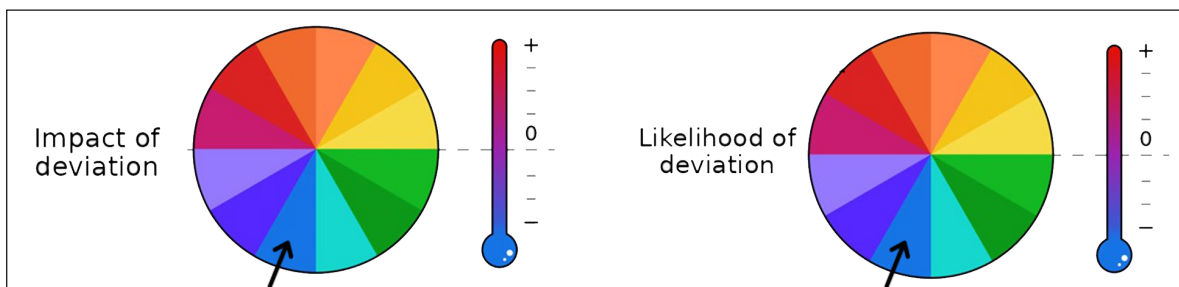
Decision Point No. 4: As noted above, an exporter must obtain either a Local Product Cost Calculation Form or a document confirming the exporting factory's readiness. A deviation may occur if the responsible employee issues the Local Product Cost Calculation Form on the basis of inaccurate information or information not supported by the required documentation, or issues a factory-readiness document without conducting an inspection and verifying that the factory is actually ready. This could result from collusion with the exporter or from the pursuit of personal gain.

The likelihood of such a deviation can be considered medium because issuing these two documents requires technical judgments and review of information submitted by the exporter, leaving room for human intervention. However, the requirement for supporting documents and the possibility of subsequent verification reduce the likelihood of misconduct. The impact, if such a deviation occurred, would be high because improperly issued documents could lead to a certificate of origin being granted to products that do not satisfy origin requirements or do not qualify as local products, creating legal and commercial consequences and undermining the credibility of the certificate-of-origin system.



Decision Point No. 5: A chamber of commerce official may issue a certificate of origin even though the required documents have not been completed or the information concerning the product or its origin is inaccurate, as a result of collusion with the exporter or for personal gain.

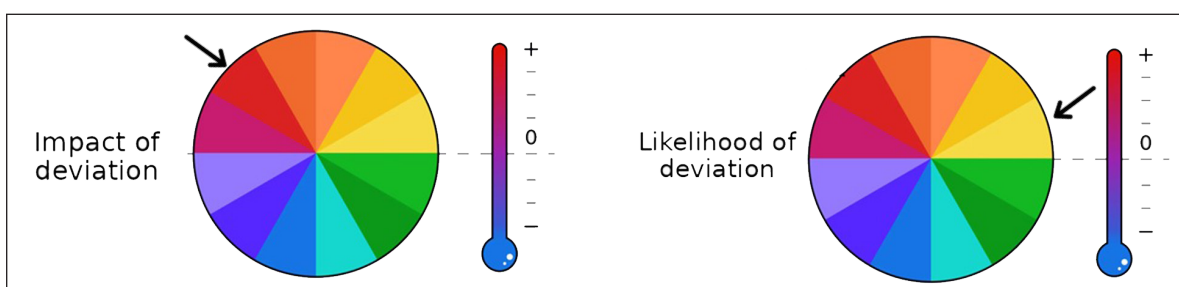
The likelihood of such a deviation can be classified as relatively low because the certificate of origin is subsequently reviewed and examined by the Ministry of National Economy before receiving final approval. Its adverse impact can likewise be classified as low, since the certificate does not acquire final legal validity until it has been approved by the Ministry of National Economy.



Decision Point No. 6: As noted above, final approval of a certificate of origin is issued by the Ministry of National Economy. A deviation in the administrative decision may occur if the responsible employee or the Director of the Import Department grants final approval despite the certificate's failure to meet legal requirements, or despite inaccurate information or supporting documents, as a result of collusion with the exporter or for personal gain.

The likelihood of such a deviation is medium. On the one hand, final approval is a critical point in the certificate-of-origin process. On the other hand, the approval process is reviewed at more than one administrative level, reducing the likelihood that a violation will be allowed to pass.

Although the likelihood of a deviation is medium, its impact would be relatively high if it occurred because final approval gives the certificate of origin legal validity. This could result in ineligible products receiving preferential treatment and could undermine the credibility of both the certificate-of-origin system and Palestinian products.



4.3 Mitigating Corruption Risks in the Issuance of Palestinian Certificates of Origin

- 1) Adopt a specific regulation or bylaw on certificates of origin under Article 7 of the Consumer Protection Law, setting out clear procedures for issuing certificates, identifying the competent authorities and required documents, and defining powers and responsibilities. This would strengthen legal certainty and limit the discretion of the competent authorities.
- 2) Standardize the forms, procedures, and operating manuals used by the relevant bodies, particularly the Ministry of National Economy, Ministry of Agriculture, Ministry of Industry, and chambers of commerce, to ensure consistent administrative practices and uniform requirements for issuing certificates of origin.
- 3) Establish a unified national electronic platform for issuing certificates of origin that connects all relevant bodies. Applications, data, documents, and attachments should be submitted through the platform, and approvals exchanged electronically through a defined workflow. Competent committees should be able to upload field-inspection reports, photographs, geographic coordinates, and other supporting documents. This would document the process, strengthen transparency, and create an electronic audit trail that reduces the risk of manipulation and collusion.

- 4) Require all chambers of commerce and industry to electronically archive certificates of origin and original supporting documents, and prohibit certificates from being issued or retained through methods that differ from the approved standardized procedures.
- 5) Prepare and adopt a unified procedures manual for chambers of commerce and industry in all governorates, covering certificate-of-origin procedures, required documents and supporting materials, methods of recordkeeping and archiving, and document-retention periods. This would ensure consistent practices across all chambers of commerce and industry.
- 6) Apply the principle of segregation of duties so that no single employee is responsible for inspection, recommendation, and final approval, and require substantive decisions to be reviewed at more than one administrative level.
- 7) Strengthen post-issuance oversight and periodic audits of issued certificates of origin, including random reviews of files and documents to verify the accuracy of the information and compliance with established procedures.
- 8) Strengthen transparency and disclosure by publishing certificate-of-origin procedures, legal requirements, applicable fees, and the timeframes required to complete transactions.
- 9) Build staff capacity through continuous training on certificate-of-origin procedures, public-service ethics, the principles of integrity and transparency, corruption risks, and methods of prevention.

5. Conclusion

Certificates of origin are commercial documents of particular legal, economic, and national importance in the Palestinian context. Their significance is not limited to establishing the origin of goods and enabling eligible products to benefit from preferential treatment in foreign markets; they also help protect the economic identity of Palestinian products and strengthen international confidence in them. The study found that certificate-of-origin procedures are inherently multi-sectoral because numerous governmental and non-governmental bodies are involved, including the Ministry of Agriculture, Ministry of Industry, Ministry of National Economy, and chambers of commerce and industry in Palestine. This creates a number of vulnerabilities and corruption risks associated with field inspections, document review, the issuance of approvals, and final approval.

Strengthening the integrity of the certificate-of-origin system therefore requires developing its legislative and regulatory framework, standardizing procedures among the competent authorities, and adopting an integrated oversight system based on transparency and accountability. Establishing a unified national electronic platform linking all relevant bodies would be one of the most important measures for reducing the risks of manipulation and collusion by electronically documenting all procedures, documents, and field inspections and improving traceability and auditability. Preventive measures designed to reduce deviations in administrative decision-making would help protect the credibility of certificates of origin, enhance the competitiveness of Palestinian products, and support the resilience of the national economy in the face of the exceptional challenges imposed by the reality of the Israeli occupation on the Palestinian people and their land.

6. Annex 1: Individual Interview Table

	Interviewee	Interview Date and Time
1	Interview with Ms. Diana Musleh - Import Department, Ministry of National Economy.	15/6/2026
2	Interview with Ms. Wafaa Al-Labadi - Director of the Import Department, Ministry of National Economy.	15/6/2026
3	Interview with Mr. Tariq Abu Laban - Ministry of Agriculture.	14/5/2026
4	Interview with Ms. Nariman Odeh - Ministry of Agriculture.	13/5/2026
5	Interview with Ms. Waseela Mahmoud - Director of the Trade Promotion Department, Ramallah and Al-Bireh Chamber of Commerce and Industry.	22/7/2026
6	Interview with Mr. Sameh Fahmi - Governance and Planning Expert.	18/5/2026
7	Interview with Mr. Urwa Al-Ahmad - Owner of the paper factory in the industrial city in Jericho Governorate.	1/7/2026

7. Sources and References

7.1 Sources

7.1.1 Legislation

- The Amended Palestinian Basic Law of 2003 and its amendments.
- Customs and Excise Law No. 1 of 1962.
- Anti-Corruption Law No. 1 of 2005 and its amendments.
- Consumer Protection Law No. 21 of 2005.
- Law No. 2 of 2006 on the General Union of Palestinian Industries and Specialized Industrial Unions.
- Decree-Law No. 4 of 2010 on the Prohibition and Combating of Settlement Products.
- Decree-Law No. 10 of 2011 on Industry.

7.1.2 Interviews

- Seven (7) individual interviews were conducted, as detailed in Annex 1 above.

7.2 References

7.2.1 Arabic and Foreign-Language References:

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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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