

*Joint Submission to UN Special
Rapporteur on the situation of
human rights in the Palestinian
territories occupied since 1967*

Submission II

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I. Introduction

In drafting this submission, the organisations Addameer Prisoner Support and Human Rights Association (Addameer), Al-Haq, and Al Mezan Center for Human Rights (Al Mezan) (our organisations) relied on our documentation and monitoring of human rights violations committed by Israel against the Palestinian people. This submission reflects our commitment to the promotion and protection of the rights of the Palestinian people, including the right to not be subjected to torture and other cruel, inhuman or degrading treatment or punishment, by exposing Israel's ongoing and persistent violations of its obligation to respect, protect, and fulfil this right, focusing on the psychological and collective torture of Palestinians across the occupied Palestinian territory (oPt) outside the context of custodial settings.

While Israel's systematic and widespread use of torture and other ill-treatment against Palestinians has been documented long before 7 October 2023, this submission focuses on incidents and patterns identified since then. As previously highlighted in your landmark report 'Anatomy of a Genocide', the detention, displacement, killing and maiming of Palestinians, with "thousands of families" who "have lost loved ones or have been wiped out", along with the massive destruction of Gaza constitutes an "incalculable trauma" that "will be experienced for generations to come".¹ In addition to being a trademark of Israel's genocide in Gaza, acts of torture committed by both Israeli forces and illegal settlers further entrench its settler-colonial apartheid regime.

II. Collective Torture

a. Torture to entrench apartheid and settler-colonialism

Torture, like other inhuman acts of apartheid, is a key tool to maintain a regime of racial discrimination and oppression by one racial group of persons over another. The practice of torture, in the framework of the crime of apartheid, has been recognised in Article 2 of the Convention on the Prohibition and Punishment of the Crime of Apartheid.

i. Trans-generational trauma inherent to the ongoing Nakba

The routine use of torture as part of the oppression of Palestinians must be understood within the broader context of Israel's settler-colonial apartheid regime imposed on the indigenous Palestinian people as a whole, including those living under Israeli occupation, within Israel's borders, and as refugees and exiles denied their right of return. This fragmentation of the

¹ UN Human Rights Council, 'Anatomy of a genocide: Report of the Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967, Francesca Albanese' (1 July 2024) UN Doc A/HRC/55/73

Palestinian people started with the 1948 *Nakba* (catastrophe in Arabic)², when Zionist militias and the Israeli military killed over 15,000 Palestinians, destroyed 531 Palestinian villages, and forcibly expelled 800,000 Palestinians (then 80 percent of the population of historic Palestine), from their homes, lands, and properties.³

One of the practices used by Israel to entrench its settler-colonial apartheid regime is the forced displacement and transfer of Palestinians. As a consequence of the Nakba, more than 77 percent of the population in Gaza are Palestinian refugees who were forcibly transferred in 1948 by Israeli forces. They have been allowed to return to their homes since then, and children in Gaza carry this intergenerational trauma with them.⁴ The repeated and ongoing mass forcible transfer of Palestinians in Gaza, the conditions of which constitute collective punishment, has only added to their trauma and mental suffering. Displaced Palestinians described it as “re-living the Nakba again. Same scene, the same... people walking, but not knowing where to go”.⁵ Indeed, these scenes constitute a painful reminder of “historic photos of Palestinian dispossession and forcible displacement of the 1948 Nakba, colourised and brought back to life”.⁶ Statements by Israeli officials referring to the “Gaza Nakba”, even explicitly demanding “Right now, one goal! A Nakba that will overshadow the Nakba of 48”, underscore the deliberate and systematic nature of this practice and its ongoing pursuit of Palestinian erasure.⁷

From October 2023 onwards, the Israeli Occupation Forces (IOF) have forced Palestinians to flee from the north to the south of Gaza, including “cutting off internet and electricity and objects indispensable to the survival of civilians, impeding the entry of humanitarian aid”.⁸ Furthermore, Israel has destroyed or damaged 92 percent of Gaza’s housing as of 17 September 2025 – stripping Palestinians of any sense of safety, peace or security.⁹ More than any previous Israeli military assault on Gaza, Israel’s ongoing genocide has added insurmountable “psychological trauma to the existing social, economic and financial stress Palestine refugees have been living under” due to the restrictions imposed by Israel’s unlawful blockade of Gaza.¹⁰

² Al-Haq, ‘Palestinian, regional, and international groups submit report on Israeli apartheid to UN Committee on the Elimination of Racial Discrimination’, (12 November 2019) <<https://www.alhaq.org/advocacy/16183.html>>

³ Palestinian Central Bureau of Statistics, ‘Dr. Ola Awad, reviews the conditions of the Palestinian people via statistical figures and findings, on the 72nd Annual Commemoration of the Palestinian Nakba’, <<https://www.pcbs.gov.ps/site/512/default.aspx?lang=en&ItemID=3734>>

⁴ Visualizing Palestine, ‘Four wars old- Fourteen years of childhood in Gaza’ (June 2021) <<https://visualizingpalestine.org/visuals/four-wars-old>>

⁵ Al-Haq, Al Mezan, and PCHR, ‘Israel’s Genocide in Gaza: The Latest Episode in the Ongoing Nakba Against the Palestinian People’ (15 May 2024) <<https://www.alhaq.org/advocacy/23099.html>>

⁶ Ibid.

⁷ Ibid.

⁸ Ibid.

⁹ UN Office of Coordination for Humanitarian Affairs, ‘Reported impact snapshot- Gaza Strip (17 September 2025)’ (17 September 2025) <<https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-17-september-2025>>

¹⁰ Relief web, ‘UNRWA After School Activities Help Children in Gaza Cope with Stress’ (19 February 2022) <<https://reliefweb.int/report/occupied-palestinian-territory/unrwa-after-school-activities-help-children-gaza-cope-stress>>

The collective torture of Palestinians through routine violence, displacement, detention and racial subjugation also occurs in the West Bank, including East Jerusalem where Israel has taken advantage of the world's attention being focused on Gaza. The United Nations Office of Coordination for Humanitarian Affairs (OCHA) has documented that “nearly 7,500 raids by Israeli forces into Palestinian towns and villages across the West Bank have taken place so far in 2025, a 37 percent increase compared with the same period in 2024.”¹¹ About 16,600 Palestinians have been forcibly displaced from the Jenin refugee camp alone, after an Israeli large-scale military assault that has decimated the camp and its infrastructure.¹²

In parallel, between January 2023 and June 2025, 3,500 settler attacks have caused the forced displacement of 2,900 Palestinians.¹³ By 9 October 2025, this number had risen to 3,095 Palestinians, including 1,544 children, mostly from Bedouin and herding communities.¹⁴ In some cases, entire communities were physically forced to flee by Israeli settlers and occupation soldiers. Al-Haq documented the forced eviction of the family of Abd al-Rahman Ka'abneh in Ramoun and their neighbours who used to live in a community in Rammun, near Ramallah. Again, illegally transferred in settlers, with the support of the IOF and police, terrorised the Palestinian community and forced 26 families to leave at gunpoint.¹⁵

Attacks by Israeli settlers have increased in tandem with Israel's unprecedented settlement expansion,¹⁶ annexationist rhetoric and legislative and policy changes designed to entrench Israel's control over Palestinian territory – including by transferring administrative powers relating to settlements and land administration from Israeli military authorities to government offices, whose primary focus is to provide services within the State of Israel.¹⁷ The recent approval of the E1 settlement plan, described as a “defining moment for settlement, for security, and for the entire state of Israel”,¹⁸ further attests to Israel's unrestrained illegality and unwavering intent to eradicate the prospect of a sovereign Palestinian State, and with it its indigenous Palestinian population. The “displacement of the Palestinian population, subsequent

¹¹ OCHA, ‘Humanitarian Situation Update #328 | West Bank’ (2 October 2025)

<<https://www.ochaopt.org/content/humanitarian-situation-update-328-west-bank>>

¹² Al-Haq, ‘Field Focus – Forcible Displacement from Jenin Refugee Camp, A symbol of Return and a Target of Erasure’ (22 May 2025) <<https://www.alhaq.org/monitoring-documentation/26433.html>>

¹³ OCHA, ‘West Bank – The Impact of Settler Attacks | January 2023- June 2025’ (10 October 2025)

<<https://www.ochaopt.org/content/west-bank-impact-setter-attacks-january-2023-june-2025>>

¹⁴ OCHA, ‘Humanitarian Situation Update #330 | West Bank’ (9 October 2025)

<<https://www.ochaopt.org/content/humanitarian-situation-update-330-west-bank>>

¹⁵ Al-Haq, ‘Comprehensive weekly report on the activity of researchers, Period: 10-17 March 2025’, on file with Al-Haq

¹⁶ See Al-Haq, ‘Al-Haq Condemns Israel's Steps towards Unprecedented Annexation, Warns of the Catastrophic Consequences of the E1 Settlement Plan’ (21 October 2025) <<https://www.alhaq.org/advocacy/26709.html>>

¹⁷ See UN General Assembly, *Israeli settlements in the Occupied Palestinian Territory, including East Jerusalem, and the Occupied Syrian Golan: Report of the Secretary-General* (12 September 2024) UN Doc. A/79/347; UN General Assembly, *Israeli settlements in the Occupied Palestinian Territory, including East Jerusalem, and in the occupied Syrian Golan: Report of the United Nations High Commissioner for Human Rights* (1 February 2024) UN Doc. A/HRC/55/72; UN OHCHR, ‘Occupied Palestinian Territory: reporting on settlements and the occupied Syrian Golan’ (26 March 2024) <<https://www.ohchr.org/en/statements-and-speeches/2024/03/occupied-palestinian-territory-reporting-settlements-and-occupied>>

¹⁸ Middle East Eye, ‘Israel approves E1 settlement to ‘erase’ Palestinian state with ‘actions not slogans’ (20 August 2025) <<https://www.middleeasteye.net/news/israel-approves-e1-settlement-smotrich-says-palestinian-state-being-erased>>

denial of their right to of return, and mass appropriation of refugee movable and immovable properties, in a large-scale ethnic cleansing known as the Nakba [...] continues to this day”.¹⁹

- ii. State-sponsored settler violence to further oppress, dominate and forcibly displace the Palestinian people

As noted just above, the rapid expansion of Israeli settlements has come hand-in-hand with State-backed settler violence against the Palestinian people. So far this year, UN OCHA has documented 1,680 attacks (as of 4 December 2025) by Israeli settlers in more than 270 communities across the West Bank.²⁰ Palestinian civil society organisations, including Al-Haq, have been sounding the alarm on illegal settler violence and mounting attacks against Palestinians for years. In 2022, in a joint written statement submitted to the UN Human Rights Council by Al-Haq, Al-Mezan and other Palestinian human rights organisations, stated:

Israeli settler violence against Palestinians is an ongoing, organized and worsening phenomenon, to ultimately drive them out of their lands and allow the advancement of Israel’s settlement enterprise. Such attacks threaten the safety of Palestinians, and include killings, beatings, throwing stones, threats with live ammunition, torching agricultural lands, pillaging natural resources, denying access to sources of livelihood, and vandalizing properties [...] Settler violence is the result of Israel’s institutionalized racial domination and oppression over the Palestinian people, exercised through the coercive environment aimed at forcibly displacing Palestinians and maintaining Jewish supremacy.²¹

At the time, the organisations noted that Palestinians were being targeted with rising intensity. Nearly four years later, these attacks have become more frequent, violent, coordinated and strategic. The Palestinian Human Rights Organizations Council (PHROC) declared their clear and renewed condemnation of such practices on 10 November 2025²² – words that continue to fall on the deaf ears of the international community, or more specifically key Western, Global North States who continue to pledge their unwavering support to Israel.²³

¹⁹ Al-Haq, ‘Al-Haq Sends Urgent Appeal to UN Special Procedures on Jenin, Following Preliminary Findings of First Field Investigation’ (6 July 2023) <<https://www.alhaq.org/advocacy/21602.html>>

²⁰ UN OCHA, ‘Humanitarian Situation Update #346 | West Bank’ (4 December 2025) <<https://www.ochaopt.org/content/humanitarian-situation-update-346-west-bank>>

²¹ UNGA, *Joint written statement* submitted by Al-Haq, Law in the Service of Man, Al Mezan Centre for Human Rights, Cairo Institute for Human Rights Studies, Habitat International Coalition, Human Rights & Democratic Participation Center “SHAMS”, Palestinian Centre for Human Rights, Palestinian Initiative for the Promotion of Global Dialogue and Democracy (MIFTAH), Women’s Centre for Legal Aid and Counseling, non-governmental organizations in special consultative status* (2 March 2022) UN Doc. A/HRC/49/NGO/216 <<https://docs.un.org/en/A/HRC/49/NGO/216>>

²² Al-Haq, ‘Israeli Settler Terrorism as a Tool of Demographic Engineering in Occupied Palestinian Territory’ (10 November 2025) <<https://www.alhaq.org/advocacy/26732.html>>

²³ For a recent example, see The Federal Government, “‘The friendship between Germany and Israel is precious’” (7 December 2025) <https://www.bundesregierung.de/breg-en/news/inaugural-visit-merz-israel->

Al-Haq documented several other serious incidents targeting Palestinian olive harvesters. M.S. (67), told Al-Haq that a group of 20 masked settlers approached him and his family while they were on their land harvesting olives:

Further, M.M. (47), an activist from the ‘Commission Against the Wall and Settlements’, reports settler attacks to the Palestinian Liaison Office so they can intervene with the Israeli Liaison Office, adding his presence on the ground. He noted:

The frequency of settler attacks on this community has increased, especially after the settlers established a pastoral outpost called "Ben Baz Farm" next to the Wadi al-Siq school within the community. This outpost was established in February 2023, and it is currently occupied by a significant number of settlers [...] Settlers had posted an announcement on their Facebook page that they would, on Wednesday, October 11, 2023, "liberate the Wadi al-Siq area from the Palestinians." That night, Wednesday, October 11, 2023, and into the early hours of Thursday, October 12, 2023, armed settlers stormed the community under cover of darkness, terrorizing the residents for

²⁶ Al-Haq, Affidavit 2025-10-151-NA-F-A5-IL-SET

more than three hours.[...] In the morning, all 28 families, comprising approximately 200 individuals, left their encampment in Wadi al-Siq, fearing settler attacks [...].

The settlers were not satisfied with terrorizing the residents and forcing them to leave. As the residents were leaving, the settlers were present at the entrance of the gathering, which branches off from the Alon settlement road, and they assaulted the residents by beating them. Among those who were beaten was Mahmoud Kaabneh, who is in his twenties. As we were informed by the Bedouin residents, he was severely beaten and his phone was stolen from him.²⁷

A.A. (55), a Palestinian olive harvester, recounted to Al-Haq how she was ambushed and beaten with sticks studded with nails by 20 armed settlers on 19 October 2025:

I moved from where I was to go downstairs to see what was happening to my children, and I was shocked to find about 20 settlers attacking me. I was completely alone at the time, with no one with me.

The settlers began beating me with sticks studded with nails. I tried to defend myself with my hands, but then one of them struck me twice on the head with a stick, causing me to fall to the ground and partially lose consciousness. I felt as though the settlers were going to kill me without anyone coming to my aid.²⁸

As a result of the attack, she sustained multiple injuries:

I was transferred from the center to the consulting hospital, where I underwent tests and scans that revealed two wounds on both sides of my head (right and left). The first wound required eight stitches, and the second eleven. I also had a wound on my right palm that required more than five stitches.

In addition, I sustained bruises on my feet and contusions all over my body, including a large bruise under my right eye and others on my left elbow and shoulders.²⁹

Al-Haq also collected the testimony of J.I. (57), a Palestinian journalist, who joined an olive harvest organized by Israeli peace activists and international solidarity groups in Beita:

At that moment, I saw a group of more than 20 settlers dressed in civilian clothes. At that time, I began taking photographs with my camera. The camera captured them assaulting the residents. [...] Moments later, I saw another group of more than 20 settlers, armed with wooden sticks, axes, and stones. They began throwing stones at the farmers and journalists. There were approximately 25 of them. [...] At that moment, I was about 50 meters away from my car and tried to approach it, but the Israeli settlers attacked me. I couldn't get close to the vehicle, and they pelted me with stones. There were approximately 20 of them. Ten settlers attacked me, so I fled in the opposite direction towards a steep slope in a rugged area. The settlers pursued me and attacked

²⁷ Al-Haq, affidavit 2023-10-1021-RB-F-A1-IL-SET

²⁸ Testimony taken from A.A. (55), resident of Al-Mughayyir, on 22 October 2025, on file with Al-Haq.

²⁹ Testimony taken from A.A. (55), resident of Al-Mughayyir, on 22 October 2025, on file with Al-Haq.

me with stones. I was struck on my back, left hand, and all over my body with stones. While fleeing from them, I fell several times on the stones and rocks [...].

I was exhausted and had various bruises all over my body, concentrated on my back and left hand, and I was in a lot of pain. [...]. As I tried to move away, I saw another group of settlers rushing towards me and attacking me. I quickly ran back to the ambulance as fast as I could and got inside to escape. [...].

I was then transported by a Palestinian Medical Relief ambulance to Rafidia Governmental Hospital in Nablus, where I was admitted to the emergency room. I received the necessary treatment, and after X-rays, it was revealed that I had various bruises and contusions all over my body.³⁰

S.S, (28), described another settler attack in Beita, on 10 October 2025:

I saw the family of Faleh al-Saleh, about ten men and women, who had been attacked by Israeli settlers. I saw several injured people, including an elderly woman who was unable to stand. I went to the ambulance and helped. There were other injured people with bruises who were transported by ambulance from the scene [...].

The settlers were chasing me, running after me. When I got up and got out of the ditch, 5-10 settlers surrounded me and started hitting me with wooden sticks. They struck me on the left side of my face, near my eye, and then on my left leg, near the knee. The settlers were carrying sticks and sharp axes, but I didn't lose consciousness. During this time, some young men and locals threw stones at the settlers surrounding me to drive them away. I managed to break free and run about 10-15 meters. Then the young men helped me because I started limping on my right leg and raising my left leg, which was in a lot of pain. [...]

I was transferred by ambulance to Rafidia Governmental Hospital. In Nablus, I was admitted to the emergency room where I underwent X-rays and a CT scan. A cast was then applied to my left leg. The doctors informed me that I had a torn cruciate ligament and a fracture of part of the kneecap. I was scheduled for surgery on October 12, 2025, to complete my treatment. Upon arriving at Rafidia Governmental Hospital, I learned from residents that dozens of people from my town of Beita had been transferred to hospitals for treatment after settlers attacked farmers and residents during the olive harvest season. The settlers also burned several vehicles and vandalized others. These settlers came from the new settlement outpost they established in the Jabal Qamas area approximately three months prior.³¹

Illegal settlers, shrouded in impunity, are increasingly emboldened to act without restraint or concern for the consequences. This is based on the very clear understanding that there are none. Accountability does not exist for crimes committed against Palestinians. Rather, inflicting serious physical and psychological harm is the norm. This harm is inflicted for the same reasons as Israel is carrying out its genocidal campaign in Gaza, carrying out brutal raids across the

³⁰ Al-Haq, Affidavit 2025-10-151-NA-F-A3-IL-SET

³¹ Al-Haq, Affidavit 2025-10-151-NA-F-A4-IL-SET

West Bank, and detaining Palestinians *en masse* – they seek to destroy Palestinian life, culture, and presence in Palestine as they pursue their Zionist, settler-colonial agenda.³²

The IOF accompany and support illegal settlers to such an extent that they now function as paramilitaries. A.H. (47), director of the Advisory Board for the Development of Non-Governmental Organizations, based in Jenin, and a Palestinian lecturer at the Faculty of Engineering at An-Najah National University in Nablus, Dr. H.S., were travelling on the road connecting Ramallah and Jericho on 13 July 2024, heading to a Bedouin community to implement some joint projects when they were harassed by Israeli settlers who falsely claimed that they were involved in terrorist activities:

They brought plastic ties and pieces of cloth, tied our hands behind our backs, and placed the cloth over our eyes. The plastic ties were then tightened considerably to inflict maximum pain on our hands. After that, the settlers threw us to the ground and began assaulting us. I received numerous blows with hands and feet all over my body, with a focus on my chest, near my heart. They also threw dirt on my face, especially since we were in an area... The terrain was dusty and rough. Adding to the chaos, one of the settlers spat in my face repeatedly, amidst shouting and cursing with profanities. This continued for approximately 30-40 minutes, according to my estimate. All of this happened while I was terrified of being shot, especially since I could no longer see what was happening around me. My only thought was that I would be shot and executed at any moment, which made me feel extremely frightened and in grave danger [...].

Dr. H.S. was suffering from severe pain. Because of the plastic bandage on his hands, he cried out in pain [...].

When Dr. H.S. tried to start the vehicle, we discovered that it had been deliberately sabotaged by the settlers. Despite this, we pushed the vehicle to get as far away from the settlers' location as possible. We managed to push the vehicle for about 200-250 meters, during which time I was barefoot, as the settlers had initially forced me to remove my shoes, causing me severe pain in my feet, especially since I was pushing the vehicle with my feet on stones, thorns, and dirt, amidst the intense beating I had received from the settlers, as previously mentioned.

As is standard practice, Israeli soldiers failed to investigate the incident and instead arrested and beat the Palestinian men. A.H.'s testimony sheds light on Israel's culture of impunity for violations committed by Israeli settlers against Palestinians:

I learned from a man named A.B., a Bedouin representative in the Wadi al-Siq area (who hails from the Ka'abneh family), that the settler in question is known to them. He told me, after I informed him of the above, that the Bedouin communities had filed several complaints against him through the Jerusalem Legal Aid Center before the Israeli High Court of Justice. His name is Nir Am Ben Bazi, and he is responsible for the

³² See Al-Haq, *Beita: A Model of Steadfast Resistance Defying Israeli Colonisation* (30 March 2024) <https://www.alhaq.org/cached_uploads/download/2024/03/30/baita-report-english-web-1-page-view-1-1711798823.pdf> p. 11

*displacement of Bedouin communities in the central Ma'arajat area and Wadi al-Siq, as well as for vandalizing and destroying homes and a school.*³³

The increased brutality of Israeli attacks often causes severe and lasting injuries to the victims, as was the case for another Palestinian farmer, S.R. (57), on 17 April 2025, whose leg was amputated. He described the daily harassment of his family by Israeli settlers living in an outpost established late in 2023, expanding the Avigali settlement:

Now, the settlers have begun to come to my land, graze their sheep there, and harass us while we are on it. The latest of these attacks occurred on Thursday, April 17, 2025, at around 6:00 PM. [...] The settler who attacked me [...] pointed the weapon at my lower body. He was no more than 30 centimeters away from me and fired a third shot at my right leg, hitting me just below the knee. I fell to the ground, and my leg was bleeding profusely. My sons and daughters started screaming, and I was in excruciating pain. I tried to hold it, but I felt like I was losing it [...]. I began to feel unable to concentrate and my vision became blurred. I lost consciousness completely a short time later. I regained consciousness in a hospital [...]. I remember waking up on the morning of Sunday, April 20, 2025, and learning from the doctors that my right leg had been amputated about 10 cm above the knee due to the injury and the inability to stop the bleeding, according to them.

Instead of being treated with respect and as a victim of physical assault, instead he was arrested by Israeli soldiers:

*On the evening of Monday, April 21, 2025, I was taken in a wheelchair by men in military uniforms. My hands were cuffed, and I was taken out of the hospital and placed in a transport vehicle. Inside, there was a metal room with a metal chair on which I sat. My injured leg was directly on the metal surface. I felt pain in my leg, as the sitting position was unsuitable for someone with an injury like me. The temperature inside the vehicle was extremely high, and the windows were closed. The vehicle drove on, and I was shaking due to the high speed and felt intense pain throughout the journey until it stopped.*³⁴

It is important to note that the incidents outlined above are not random isolated violations. Rather, the staggering increase in settler attacks against Palestinian men, women and children – armed by the IOF and targeting strategic areas that advance Israel's annexation of the occupied West Bank, including East Jerusalem – requires us to examine illegally transferred in settlers and settler violence as a vehicle driving the settler-colonial goals of the State of Israel. This has been expressly confirmed by UN Secretary General António Guterres and the UN Office of the High Commissioner for Human Rights (OHCHR), which identified the policies of the current Israeli government as being aligned “to an unprecedented extent with the goals of the Israeli

³³ Al-Haq, Affidavit 2024-08-059-RB-F-A1-IL-SET

³⁴ Al-Haq, Affidavit 2025-04-058-HE-F-A1-IL-SET

settler movement to expand long-term control over the West Bank, including East Jerusalem, and to steadily integrate the occupied West Bank into the State of Israel.”³⁵

As the Committee Against Torture recently concluded, Israel adopts a State policy of collective punishment. This includes the *de facto* “policy of organized and widespread torture and ill-treatment [...] that has gravely intensified since 7 October 2023”.³⁶ Bearing in mind Israel’s institutionalised policy of racial domination over the Palestinian people, one must consider how the widespread and systematic criminal conduct – specifically the physical and psychological harm inflicted on the indigenous Palestinian population, compounded by an environment of total, absolute impunity in which they are treated as subhuman, which amounts to torture – qualifies as inhuman acts of apartheid, defined as “acts committed for the purpose of establishing and maintaining domination by one racial group of persons over any other racial group of persons and systematically oppressing them”.³⁷

The aforementioned acts amount to the infliction upon the members of a racial group or groups of serious bodily or mental harm, by the infringement of their freedom and dignity, and by subjecting them to torture and cruel, inhuman or degrading treatment or punishment.³⁸ The constant risk of harassment and physical attack, as well as the danger to one’s livelihood and very means of economic survival – as is the case for olive farmers – and destruction of essential infrastructure, including water sources, amounts to the “deliberate imposition on a racial group or groups of living conditions calculated to cause its or their physical destruction in whole or in part”.³⁹ Each of these categories of acts are prosecutable as crimes against humanity under the Rome Statute of the International Criminal Court (ICC).⁴⁰ Moreover, the coordinated and targeted effort to connect Israeli settlements and/or outposts and forcibly displace Palestinians living in these areas, an integral component to Israel’s ongoing Nakba, constitutes a further violation of international law, namely, forcible transfer and the transfers of civilians of the Occupying Power into the occupied territory, prohibited under Article 49 of the Fourth Geneva Convention,⁴¹ and a war crime listed in the Rome Statute.⁴² The collective torture inflicted on Palestinians across the occupied West Bank, including East Jerusalem and inhuman and degrading treatments is criminalised as a war crime and crime against humanity under the Rome Statute.⁴³

³⁵ UN General Assembly, *Israeli settlements in the Occupied Palestinian Territory, including East Jerusalem, and the Occupied Syrian Golan: Report of the Secretary-General* (12 September 2024) UN Doc. A/79/347, para 4; UN General Assembly, *Israeli settlements in the Occupied Palestinian Territory, including East Jerusalem, and in the occupied Syrian Golan: Report of the United Nations High Commissioner for Human Rights* (1 February 2024) UN Doc. A/HRC/55/72, para 6.

³⁶ UN Committee Against Torture, *Concluding observations on the sixth periodic report of Israel* (advance unedited version), para. 28

³⁷ International Convention on the Suppression and Punishment of the Crime of Apartheid 1974 (Apartheid Convention), Article II

³⁸ Apartheid Convention, Article II(a)(ii)

³⁹ Apartheid Convention, Article II(b)

⁴⁰ Rome Statute of the ICC, Article 7(1)(j)

⁴¹ Convention (IV) relative to the Protection of Civilian Persons in Time of War. Geneva, 12 August 1949, Article 49(1) and (6)

⁴² Rome Statute of the ICC, Article 8(2)(a)(vii)

⁴³ Rome Statute of the ICC, Article 7(f) and Article 8(2)(a)(ii)

iii. Israel's widespread and systematic practices inflicting severe pain and suffering on Palestinians: an examination of military dog attacks

In recent years, the IOF has routinely deployed attack dogs to terrorise and maim Palestinian children.⁴⁴ These attacks are a clear method of torture and intimidation against Palestinians as part of a systematic policy aimed at spreading terror and fear among the civilian population as a means to control and racially dominate the Palestinian people.

Al-Haq's field researchers have documented various testimonies supporting the commission of this act of torture against Palestinian children, men and women. On 12 February 2024, in the Balata refugee camp in Nablus, the IOF raided A.H.'s home with a large police dog that attacked both her and her son, aged just three years old. She told Al-Haq that a "large police dog" without its muzzle attacked and bit her and her son:

The police dog was putting both paws on my shoulders. I could hear my son scream in pain and my daughters were shrieking and crying out of fear and terror. [...] We continued to try to keep the dog away from us for about 4-5 minutes, during which I heard the Israeli soldiers screaming and talking in Hebrew that I don't understand. Then a masked Israeli soldier came in with a black mask on his face aiming his automatic weapon at me and my sons and daughters. He saw that the police dog was grabbing and biting my son's bottom from behind . . .

She went on to describe how the soldiers dragged her son outside and brought him back:

The soldiers let [the dog] take him like a "chicken between his fangs" [...] the Israeli soldiers prevented me from following my son after one of the soldiers hit me with the butt of the rifle on my chest and forced me into the house, and my daughter [...] was screaming loudly. Then the Israeli soldier picked her up and threw her at me inside the bedroom. There were between 10-15 Israeli soldiers inside the house

[...] after about three minutes one of the Israeli soldiers came carrying my son. He was unconscious and without clothes and his whole body was wrapped in tin. There was blood on the tin and when I saw this scene, I thought the dog had killed my son.

⁴⁴ Defence for Children International- Palestine, 'Israeli military dog attacks Palestinian toddler near Jenin' (14 January 2025) <https://www.dci-palestine.org/israeli_military_dog_attacks_palestinian_toddler_near_jenin>



Palestinian child I.H., receiving medical treatment for his severe bleedings at the emergency department of the Radifia Governmental Hospital

She stressed that:

After what happened to us, my children are still suffering from severe psychological trauma so much that they do not go to their schools because of the intensity of fear and terror that they experienced due to the raid on our house of the soldiers and the police dog.⁴⁵

Similarly, on 5 November 2024, the IOF used a dog to attack the Palestinian toddler, O.T. (3), in the town of Qabatiya, near Jenin, and only intervened after five minutes, leaving O.T, “bleeding and in shock”.⁴⁶

In a separate incident, T.T. explained to Al-Haq how his children were attacked by Israeli military dogs during a search of his house at 10:00 AM on 25 January 2024:

About 8–10 soldiers entered the staircase and immediately went up to the second floor, while 3–4 other soldiers escorted me to the first floor and held me there.

[...] after less than one to two minutes passed, Israeli soldiers brought my children from the second floor and detained them with us on the first floor. The soldiers asked my children their names, and during that one of the soldiers assaulted my son Amer Turkman by hitting him several times with his hands on the abdomen.

[...] one of the Israeli soldiers asked my son [M.T.] to sit in the corner of the living room and this was surprising and incomprehensible to me, especially since we were all sitting next to each other.

[...] after about 10 minutes [...] I saw a police dog entering the living room in a hurry. The dog was large in size, and black and brown in colour. [...] and without the presence of an iron muzzle on the mouth [...] attacked my son [M.T.]. My wife and I tried to keep

⁴⁵ Al-Haq Affidavit 2024-02-007-NA-F-A1-IL-CLD, taken from A.H., resident of Nablus

⁴⁶ Defence for Children International- Palestine, ‘Israeli military dog attacks Palestinian toddler near Jenin’ (14 January 2025) <https://www.dci-palestine.org/israeli_military_dog_attacks_palestinian_toddler_near_jenin>

the dog away from my son in the midst of the screaming from all my family members and the screams of my son [M.T.]. The more I managed to keep the dog away from my son the more the dog escaped us again and attacked my son [M.T.]. This was repeated several times in front of a number of Israeli soldiers without them intervening. They were laughing while looking at us [...]. I managed to grab the harness that was attached to the dog's belly and back and took the dog away from my son [M.T.], while I shouted at the soldiers, "Haram Alikum, little boy", but the dog escaped me again and attacked my son [M.T.] again.

He added that:

*The Israeli soldiers did not find any weapons or the like in my house, so there is no justification for attacking my aforementioned son with a police dog.*⁴⁷

J.K. (14) described being attacked by a military dog during an Israeli raid in the Tulkarm refugee camp on 5 May 2024:

Israeli soldiers were about 20-30 meters away from me and they were outside the military vehicles, and in those moments, suddenly, I saw a medium-sized dog running towards me coming from the direction of the Israeli soldiers. Moments later the dog reached me and started attacking me. I screamed from the intensity of the attack, and from the fear that the dog was trying to bite my left hand. I continued to scream.

My mother, [H.K.], tried with all her power to get the dog away from me . . .after around a minute the dog moved away from me and ran towards the Israeli soldiers.

This dog was medium in size. There were no devices installed on it and there was no muzzle on its mouth during its attack on me . . . throughout the period of the dog attacking me the Israeli soldiers did not approach us but they were watching the dog attack . . .

J.K. has been deeply affected by her experience:

*I cannot describe the fear and terror I experienced during the attack by the police dog accompanying the Israeli soldiers and as it ran rapidly toward me.*⁴⁸

D.D. (44), a blind Palestinian woman, also recounted the IOF raid on her house on 22 February 2022 around 4:30 am:

I was surprised when something grabbed me and dragged me forcefully to the ground after it had gained control of me. In my extreme fear, I started calling for help and screaming, "Help me! There's a jinn! A jinn!" However, I couldn't identify what had grabbed me. [...].

He attacked me and pushed me backward until I fell onto the sofa. Then, while I was defending myself, my hand got caught in this attacker. He then went back and dragged

⁴⁷ Al-Haq Affidavit 2024-01-004-JN-F-T1-IL-CLD, taken from T.T., resident of Bir al-Basha

⁴⁸ Al-Haq Affidavit 2024-05-026-TK-F-T3-IL-CLD, taken from JK, resident of Tulkarm

my sister, Duaa, back to the outside room, while the rest of us were detained with my mother, who managed to see him and confirmed that he was a police dog. That's what my mother told me. As for me, I remained detained alone in another room. We remained in a state of terror and anxiety until we heard voices speaking Hebrew saying "Boo-boo." It was he who freed my hand from where it was caught on the dog. At that moment, I realized that the occupation soldiers had come to our house and didn't care about what had happened to us.

D.D. and her family were severely affected by the raid:

To this day, we are still deeply traumatized by what happened to us and the soldiers leaving the house without providing any treatment or even an apology. I sustained scratches and swelling on my right hand after being dragged by the police dog, as I mentioned earlier. They completely disregarded the fact that my sister and I are blind.⁴⁹

A.M. (16) spoke to Al-Haq about his experience on 2 September 2021:

At approximately 5:30 AM on Thursday, September 2, 2021, while I was at home with my family, I awoke to the sound of my father and some family members saying that Israeli military forces were present in the vicinity of the house. While I was in bed, suddenly and without warning, I saw a large grey dog with cameras attached to its neck and a metal cage over its mouth. I was in the bedroom at the time, but I saw the dog rushing towards me and throwing itself directly on top of me. It all happened in a flash, and I started screaming at the top of my lungs in fear. The dog, after grabbing me with its paws, dragged me out of my bedroom and into the living room where the rest of my family was. It was there that I saw, for the first time, a number of Israeli occupation soldiers inside the house. There were about 10-12 Israeli soldiers in military uniforms, armed. The dog continued to pin me down, throwing itself on top of me, preventing me from moving. Although my parents shouted at the soldiers, demanding that the dog be removed from me, one of the soldiers stood next to me and refused to allow my family to approach. The soldiers then moved the rest of my family away from me and took them to another room in the house. I saw the soldiers spreading out and working. During the house search, I was still restrained by the dog, which, in full view of the soldiers, used its paws to remove my clothes, leaving me in only my underwear. Luckily, the dog had a metal cage on its mouth, yet it still managed to pull and remove my clothes. This continued for about half an hour, with the dog restraining me. It repeatedly used its mouth to attack me through a small opening in the front of the cage, and it also used its paws to attack me, causing some scratches, especially on my right knee. Despite my screams throughout this time, the soldiers did nothing to remove the dog. Then, after about half an hour, two Israeli soldiers approached me, removed the dog, and took it outside the house. At this point, I was freed from the dog's control, left in my underwear.⁵⁰

⁴⁹ Testimony taken from D.D. (44), resident of Tubas, on 24 February 2022, on file with Al-Haq.

⁵⁰ Testimony taken from A.M. (16), resident of Jenin, on file with Al-Haq

The children who either witness these dog attacks or have been attacked by Israel's military dogs have been severely traumatised. This trauma is heightened not only by their young age and vulnerability, but also by the savagery of the dogs, and the violent armed raids of their homes by large numbers of Israeli soldiers. The very real sense of powerlessness that permeates life for Palestinians across the oPt compounds the psychological effects of these brutal events, with parents forced to watch their child be viciously mauled without being able to intervene; make it stop; ask for help; or have any justice and accountability for the criminal acts of the IOF.

b. Torture as a genocidal act

Israel is committing acts of torture against the Palestinian people in Gaza as part of a pattern of genocidal acts, in breach of the Convention on the Prevention and Punishment of the Crime of Genocide. Since 7 October 2023, the UN Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967 has issued three reports analysing Israel's commission of genocidal acts in the Gaza Strip.⁵¹ Throughout the course of 2024, in *South Africa v. Israel*, after finding that Israel was plausibly committing genocide against Palestinians in Gaza, the International Court of Justice issued three Orders indicating provisional measures to protect the rights of Palestinians under the Convention on the Prevention and Punishment of the Crime of Genocide.⁵² In September 2025, the UN Independent International Commission of Inquiry on the Occupied Palestinian Territory including East Jerusalem, and Israel determined that Israel is committing the genocidal acts of killing; causing serious bodily or mental harm; inflicting conditions of life calculated to destroy Palestinians in Gaza; and imposing measures intended to prevent births.⁵³

⁵¹ UN Human Rights Council, 'Anatomy of a genocide: Report of the Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967, Francesca Albanese' (1 July 2024) UN Doc A/HRC/55/73; UN General Assembly, 'Report of the Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967, Francesca Albanese: Genocide as colonial erasure' (1 October 2024) UN Doc A/79/384; UN Human Rights Council, 'From economy of occupation to economy of genocide: Report of the Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967, Francesca Albanese' (2 July 2025) UN Doc A/HRC/59/23

⁵² *Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (South Africa v. Israel)* Order of 26 January 2024 <<https://www.icj-cij.org/sites/default/files/case-related/192/192-20240126-ord-01-00-en.pdf>>; *Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (South Africa v. Israel)* Order of 28 March 2024 <<https://www.icj-cij.org/sites/default/files/case-related/192/192-20240328-ord-01-00-en.pdf>>; *Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (South Africa v. Israel)* Order of 24 May 2024 <<https://www.icj-cij.org/sites/default/files/case-related/192/192-20240524-ord-01-00-en.pdf>>

⁵³ UN Independent International Commission of Inquiry on the Occupied Palestinian Territory including East Jerusalem, and Israel, 'Legal analysis of the conduct of Israel in Gaza pursuant to the Convention on the Prevention and Punishment of the Crime of Genocide' (16 September 2025) UN Doc A/HRC/60/CRP.3, para 252-254

- i. Forcible displacement as a means of inflicting severe mental suffering, with an intent to destroy Palestinians in Gaza

The record demonstrates that the threat and use of unlawful violence against Palestinians as a means of forcing their transfer for replacement by Israelis was a central aspect of the Nakba during the initial large-scale dispossession and expulsion of the Palestinian people from Mandate Palestine throughout 1947-9. To facilitate the mass expulsion of Palestinians, Zionist militias employed several tactics to spread fear among Palestinians and terrorise them into mass exodus, including the use of loudspeakers in villages about to be targeted to warn of the terrible consequences to befall them should they fail to leave voluntarily, or to broadcast terrifying noises to frighten the population.

Similar patterns and policies are inherent in the ongoing genocidal assault on Palestinians in Gaza, where Israel has been inflicting psychological torture against Palestinians through its unlawful use of so-called “evacuation orders”. Israeli Heritage Minister, Amichai Eliyahu, having considered the use of nuclear weapons against the Palestinians of Gaza, suggested as an alternative option: “The second way is to work out what’s important to them, what scares them, what deters them.” Such insights into the philosophy of those overseeing Israel’s genocidal assault on Gaza evidences the inherent role which spreading terror within and across the Palestinian civilian population, already collectively categorised as mere human shields, has served on the part of Israel’s military.

The issuance of “evacuation orders” to forcibly displace Palestinians in Gaza – first from their homes, and subsequently, and repeatedly, from any place or space in which they might seek refuge – intends to destroy physical and social communities; cause severe and lasting physical and mental harm; and ultimately erase Palestinians from Gaza. The mental toll of Israel’s displacement orders is compounded by additional attacks whereby the threat of imminent and inevitable violence, detention, family dispersal and fragmentation, and enforced disappearances is intended to force their permanent transfer. At the same time, Palestinians are forced to flee into unsafe and inhumane conditions unfit for human survival, intended to destroy the group. This process amounts to collective psychological torture and ill treatment prohibited under Articles 1, 2 and 16 of the Convention. The acts of torture when carried out with an intent to destroy the Palestinian group, further amount to acts of genocide.

Presented to the public as proof of its efforts to minimise civilian casualties and to support its alleged compliance with fundamental principles of international humanitarian law (IHL), Israeli “evacuation orders” aim to achieve the direct opposite. Over 90 per cent of Gaza’s population (including the elderly, disabled, sick, injured, and expectant and breastfeeding mothers) have been forcibly displaced from their homes and temporary shelters,⁵⁴ the majority countless times, to alleged “safe zones”. Contrary to their label, these zones only further endanger Palestinians in Gaza. With insufficient space, shelter, sanitation facilities, food and water sources, or medical care, these “safe zones” are intentionally designed to ensure the destruction of Palestinian life

⁵⁴ UN OCHA, ‘Middle East and North Africa: Occupied Palestinian Territory’
<<https://www.unocha.org/occupied-palestinian-territory>>

sheltering there.⁵⁵ The Israeli military routinely targets these areas.⁵⁶ This is in addition to striking the areas subject to displacement orders before Palestinians have had the opportunity to gather what remains of their belongings or even learn of the displacement order.⁵⁷ Israel also routinely targets the routes it has instructed forcibly displaced Palestinians to use as they flee in search of ever-evasive safety.

Since Israel breached the “ceasefire” on 18 March 2025, launching so-called Operation Gideons Chariot, over one million Palestinians have been forcibly displaced across the Gaza Strip.⁵⁸ Palestinians subject to displacement orders are experiencing terror, subjected to a slow death from the environment, with no safe space to shelter from attacks, as Israel targets hospitals and shelters filled with displaced Palestinians.⁵⁹

- ii. The methods through which Israel’s policy of mass forced displacement causes severe mental suffering among Palestinians in Gaza

Israeli “evacuation orders” have manifested in the form of air-dropped leaflets, social media posts, phone calls, text messages, and drones with loudspeakers. They demand that civilians leave their homes or shelters and move along specified routes and roads prescribed by the IOF for “safe relocation”.⁶⁰ By way of example, on 13 October 2023, Israel air-dropped leaflets⁶¹ ordering the evacuation of over one million Palestinians in northern Gaza to the southern districts while continuing to relentlessly carpet-bomb the entire Gaza Strip by air, land and sea. This included the southern districts, where most Palestinians have sought shelter.⁶² On the same day, and as Palestinians were forcibly moving to the south through Salah Al-Din street — the same “safe routes” indicated for evacuation by Israel — the Israeli military attacked civilians with airstrikes, killing 70 Palestinians and injuring 150 others.⁶³ Media reports quoting the IOF

⁵⁵ Forensic Architecture <<https://forensic-architecture.org/investigation/humanitarian-violence-in-gaza>>

⁵⁶ UN OCHA, ‘Gaza: Israel continues to kill entire displaced families in area it designated as “safe” – OHCHR’ (27 June 2025) <<https://www.un.org/unispal/document/gaza-israel-continues-to-kill-entire-displaced-families-in-area-it-designated-as-safe-ohchr/>>

⁵⁷ See Forensic Architecture <https://content.forensic-architecture.org/wp-content/uploads/2024/05/Inhumane-Zones-Report-Forensic-Architecture_WEBSITE.pdf>

⁵⁸ UNRWA, ‘UNRWA Situation Report #189 on the Humanitarian Crisis in the Gaza Strip and the occupied West Bank, including East Jerusalem’ (22 September 2025) <<https://www.unrwa.org/resources/reports/unrwa-situation-report-189-situation-gaza-strip-and-west-bank-including-east-jerusalem>>

⁵⁹ UN News, ‘Gazans ‘in terror’ after another night of deadly strikes and siege’ (16 May 2025), <https://news.un.org/en/story/2025/05/1163316>; UN OCHA, ‘OCHA update: Hundreds of families displaced amid ongoing hostilities in northern Gaza’ (1 July 2025) <<https://www.un.org/unispal/document/ocha-update-hundreds-of-families-displaced-amid-ongoing-hostilities-in-northern-gaza/>>

⁶⁰ See Forensic Architecture, Humanitarian Violence: Israel’s Abuse of Preventative Measures in its 2023-2024 Genocidal Military Campaign in the Occupied Gaza Strip (7 March 2024); Forensic Architecture, ‘Humanitarian Violence (Interactive Platform)’ <<https://humanitarian-violence.forensic-architecture.org/displacement>>

⁶¹ Israel Defense Forces, Post (X, 13 October 2023) <<https://x.com/IDF/status/1712825819691716748>>

⁶² Al-Haq, Al Mezan, and PCHR, ‘No Safe Place: Despite “Evacuation Order”, Israel Continues to Carpet-Bomb Gaza From North To South’ (18 October 2023) <<https://www.alhaq.org/advocacy/21927.html>>

⁶³ Al-Haq, Al Mezan, and PCHR, ‘URGENT: Israel’s Evacuation Order to 1.1 million Palestinians in Gaza is Direct Forcible Transfer, Urgent Intervention is Needed’ (13 October 2023) <<https://www.alhaq.org/advocacy/21896.html>>

have stated that between October 2023 and November 2024 “over two million evacuation notifications have been distributed, more than 12 million flyers have been dropped, over 100,000 phone calls made and over 800,000 voice messages sent for evacuations.”⁶⁴

Online or printed maps of Gaza, dropped on the trapped population as flyers, which supposedly outline areas that must be evacuated and where to relocate to now exist alongside countless other evacuation maps that differ substantially and provide often contradictory information. Some adopt a neighbourhood-based logic, some are heavily magnified to the extent that it is unclear which area of Gaza is being depicted. This lack of clarity is exacerbated by different orientations of the map which create further confusion, in addition to numerous incidents of mistaken placenames which make it almost impossible to decipher which area is designated for evacuation.⁶⁵

Determining an appropriate course of action in a situation of either no access to instructions or access to multiple sources each of which contains different instructions, in a context of extreme stress and consistent danger is naturally unbelievably challenging. The UN Human Rights Office has repeatedly raised concerns that the IOF's evacuation orders are confusing, often instructing people to relocate to areas where IOF military operations are ongoing.⁶⁶ Thus, whether they be leaflets dropped over the territory or information disseminated online, the clarity and specificity of the message therein is neither understandable, logical, coherent nor reliable. The complex and erroneous content continuously issued by the IOF can only be viewed as measures meant to satisfy the demands of the international community while simultaneously crowding Palestinians together so that their relentless attacks against the civilian population cause even greater numbers of casualties. Moreover, the terror inherent in the notification of an “evacuation order” is not merely a consequence of Israeli military activity but an integral element of the unlawful conduct.

The International Criminal Tribunal for the Former Yugoslavia (ICTY), dealing specifically with the crime of forcible transfer, has found that it may constitute the underlying conduct that causes the genocidal act of serious bodily or mental harm. By this logic, the same conduct evidently reaches the threshold of severe psychological suffering amounting to torture under the Convention. In *Popovic*, the Trial Chamber noted that the threshold would more likely be met if the forcible transfer “operation was attended by such circumstances as to lead to the death

⁶⁴ Olive Enokido-Lineham and Ben van der Merwe, ‘Teenager describes forced separation from family as Israel evacuates 90% of North Gaza’ (*Sky News*, 5 November 2024) <<https://news.sky.com/story/teenager-describes-forced-separation-from-family-as-israel-evacuates-90-of-north-gaza-13246122>>

⁶⁵ See Forensic Architecture, “Humanitarian Violence: Israel’s Abuse of Preventative Measures in its 2023-2024 Genocidal Military Campaign in the Occupied Gaza Strip” (7 March 2024) Section 6.1.3 <https://content.forensic-architecture.org/wp-content/uploads/2024/03/Humanitarian-Violence_Report_FA.pdf> accessed 23 September 2025; Al-Haq, *How to Hide a Genocide: The Role of Evacuation Orders and Safe Zones in Israel’s Genocidal Campaign in Gaza* (1 January 2025) <https://www.alhaq.org/cached_uploads/download/2025/01/02/evacuation-orders-two-pages-view-1735842246.pdf>

⁶⁶ UN Palestine, ‘OHCHR: Palestinians have nowhere left to shelter’ (10 July 2024) <<https://palestine.un.org/en/273674-ohchr-palestinians-have-nowhere-left-shelter>>

of the whole or part of the displaced population”.⁶⁷ The Trial Chamber supported its reasoning with reference to the ruling in *Blagojević and Jokić*, which addresses in detail the impact of forced transfer on the displaced population. This case is highly relevant to the present analysis, as the forcible transfer of Bosnian Muslims from their homes is similar in many ways to the repeated forced displacement of over 1.9 million Palestinians in Gaza.⁶⁸

The lack of proper advance warning, along with being directly fired upon while attempting to flee to areas lacking adequate supplies of food, medicine, shelter or even water for the thousands of displaced people, before being forcibly displaced once again, led the Trial Chamber to conclude:

[T]he level of mental anguish suffered by the women, children and elderly people who were forcibly displaced from their homes - in such a manner as to traumatise them and prevent them from ever returning - obliged to abandon their property and their belongings as well as their traditions and more in general their relationship with the territory they were living on, does constitute serious mental harm.⁶⁹

In addition to the manner in which the displacement of Bosnian Muslims was carried out, throughout the stages of forcible transfer men were separated from their families. The psychological impact of this was noted in both *Blagojevic and Jovic* and *Krstic*. In each case, the Trial Chamber found that Bosnian Serb forces also satisfied the actus reus of causing serious bodily or mental harm, as defined in Article II (b) of the Genocide Convention, to the men that were to be executed, and to those “who were separated from them in respect of their forced displacement and the loss suffered by survivors among them”.⁷⁰ The suffering of the forcibly displaced women, children and elderly whose loved ones were violently detained is highlighted by the Trial Chamber in *Blagojevic and Jovic*, which found — based on ample evidence — that this reached the threshold of serious mental harm constituting a genocidal act for the purposes of Article 4 of the ICTY Statute.⁷¹ In its judgment, the Trial Chamber explained that not only was the experience of being separated from family extremely traumatic, but that the terrible consequences it had on their lives, including the pain of having no information on the fate or whereabouts of the individuals taken, caused lasting and severe anguish.⁷² In fact, evidence of family members being separated supported the Chamber’s ultimate finding that the perpetrators intended that the forcible transfer, and the way it was carried out, would cause serious mental harm to the victims’.⁷³

The parallels between the forcible transfer and genocide of Bosnian Muslims and that of Palestinians in Gaza is striking. Shortly after the IOF launched its ground operations in the Gaza

⁶⁷ *Prosecutor v. Vujadin Popovic et al.* (Judgment) IT-05-88-T (10 June 2010), para. 813

⁶⁸ UN OCHA, ‘Reported impact snapshot | Gaza Strip (17 September 2025)’ (17 September 2025) <<https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-17-september-2025>>

⁶⁹ *Prosecutor v. Blagojević and Jokić* (Judgment) IT-02-60-T (17 January 2005), para. 652

⁷⁰ *Prosecutor v. Radislav Krstic* (Judgement) IT-98-33-T (2 August 2001), paras. 426, 427, 543; *Prosecutor v. Blagojević and Jokić* (Judgment) IT-02-60-T (17 January 2005), paras. 644-654

⁷¹ *Prosecutor v. Blagojević and Jokić* (Judgment) IT-02-60-T (17 January 2005), para. 652

⁷² *Prosecutor v. Blagojević and Jokić* (Judgment) IT-02-60-T (17 January 2005), para. 653

⁷³ *Prosecutor v. Blagojević and Jokić* (Judgment) IT-02-60-T (17 January 2005), para. 654

Strip, towards the end of October 2023, reports of Palestinians being detained in northern Gaza began to emerge.⁷⁴ Starting on 12 November, UNRWA began recording the detention of Palestinian civilians inside its facilities. On 16 December, the UN OHCHR stated it received “numerous reports of mass detentions, ill-treatment and enforced disappearance of possibly thousands of Palestinian men and boys, and a number of women and girls” at the hands of the IOF.⁷⁵ Israel’s genocidal war and policies of forcible transfer and detention without charge or merit directly resulted in an estimated 17,000 unaccompanied and separated children (UASC) in Gaza by May 2024.⁷⁶ However, due to the difficulties in monitoring the situation given the constant insecurity, multiple displacements and the operational access issues for organisations and services that work with children, the figure could be higher.

Like the ICTY Trial Chamber, the Global Protection Cluster (a network of NGOs, international organisations and UN agencies) has noted how the separation of children from their family members, or children who are sole survivors of incidents, creates catastrophic trauma for children.⁷⁷ Separation from family members is a highly distressing event that has lasting harmful impacts on child development, and children who are separated are sometimes unable to find extended family members⁷⁸— if any have managed to survive. Given the lack of resources and assistance available within Gaza, these children are at risk of neglect, exploitation, starvation and disease.

Recalling the jurisprudence of international criminal tribunals, which has established that instances of family separation while forcibly displaced constitutes “serious mental harm”, it is clear that Israel’s evacuation orders and policy of detaining Palestinians across Gaza — including the brutal manner in which they are carried out — is intended to destroy the population by inflicting lasting and severe mental suffering on the victims and their families. However, the similarities between the forcible transfer of Palestinians in Gaza and that of Bosnian Muslims by Serb forces extend beyond the separation of (mostly) men and boys from their families. Just as Bosnian Muslims were forced to leave their possessions behind and flee their homes under fire, Palestinians in Gaza have been subjected to the very same conditions. In many cases, Palestinians in Gaza have had to leave their homes or shelters in the midst of hostilities as Israel gives little to no notice of a planned attack.

Testimony gathered by Al-Haq’s field researchers in Gaza provides ample evidence of Israel’s forced displacement of Palestinians in Gaza and the illegal manner in which they were carried out. In discussing the forced displacement of civilians from the Al-Shakoush and Al-Laqbeiba

⁷⁴ UNRWA, ‘Detention and alleged ill-treatment of detainees from Gaza during Israel-Hamas War (April 2024)’ <https://www.unrwa.org/sites/default/files/content/resources/summary_on_detention_and_alleged_ill-treatmentupdated.pdf>

⁷⁵ UNRWA, ‘Detention and alleged ill-treatment of detainees from Gaza during Israel-Hamas War (April 2024)’ <https://www.unrwa.org/sites/default/files/content/resources/summary_on_detention_and_alleged_ill-treatmentupdated.pdf>

⁷⁶ Global Protection Cluster, Protection Analysis Update: The Systematic Destruction of the Fabric of Life (May 2024) <https://globalprotectioncluster.org/sites/default/files/2024-05/gaza_pau_final_05.24.pdf> 9

⁷⁷ *Ibid*

⁷⁸ *Ibid*

areas, Mohammed (a member of Palestinian Civil Defence in Gaza), noted how – despite abiding by so-called “evacuation orders” – displaced civilians were directly fired upon:

*Everything that moved was being targeted. A group of displaced civilians was riding on a cart pulled by a donkey. We were shocked when the Israeli occupation forces opened artillery fire on them and killed them. Our teams transported the bodies and retrieved them from the site.*⁷⁹

The Civil Defence crews themselves were directly fired upon by quadcopter drones. Additionally, a small artillery shell was fired at the ambulance, which was damaged in the incident — even the diesel tank took a direct hit from the Israeli forces. Services in that area came to a halt because of the vehicle damage. Mohammed also explained that despite the IOF publicly stating on its platforms that the “red zone” (a displacement area) is confined to the eastern part of Rafah, through the use of overwhelming firepower, all civilians were effectively forced out of Rafah under threat — by Israeli warplanes, quadcopter drones, indiscriminate gunfire and artillery shelling targeting civilians’ homes. As a result, all or most of the civilians in Rafah Governorate were displaced from Rafah to Khan Younis and the Central Governorate.⁸⁰

Ahlam, a 65-year-old woman, recounted to Al-Haq how she was forcibly displaced from Al-Katiba to Al-Yarmouk, to Jabalia, to Ahmad Yassin Street, to Sheikh Radwan, stating she’s “been through it all”. She said to Al-Haq:

*The first place we were displaced to was Sheikh Radwan, where we were besieged for 15 days—15 days with no water, no food, nothing. The water was filthy; we had to filter it using scented cotton and medical gauze to make it drinkable. I also have a kidney stone. We lived through 15 days of siege. Then we escaped—from Abu Iskandar to Al-Yarmouk, then to Jabalia, then to Ahmad Yassin Street, then back to Sheikh Radwan. I went around in circles, worn out from moving. I'm an elderly woman, my back is broken, and I suffer from a very difficult life. I endure pain and am on seven types of medication [...] I don't even understand how I'm still moving. My entire back is held together with platinum.*⁸¹

When asked did she have her documents during the displacements, Ahlam responded “I lost everything—not just one thing”.⁸²

Fatima, a forcibly displaced woman in need of weekly dialysis spoke to Al-Haq about being separated from her son:

[T]he Israeli army took him from me. I don't know where he is. Since the day I arrived, I've had no information about him. I wish I knew. We've contacted the Red Cross multiple times, and they keep telling me, “We haven't received any updates about him.”

⁷⁹ Al-Haq Affidavit GZ114.2

⁸⁰ Al-Haq Affidavit GZ114.2

⁸¹ Al-Haq Affidavit GZ417

⁸² Al-Haq Affidavit GZ417

*It's been six months, and we're still calling them—but we still don't know anything about him, honestly...*⁸³

Such is the severity of the situation that UN Secretary General Antonio Guterres has said that “[j]ust when we thought it couldn’t get any worse in Gaza — somehow, appallingly, civilians are being pushed into ever deeper circles of hell” as they “keep being forced to move like human pinballs across a landscape of destruction and death”.⁸⁴ Andrea De Domenico, the head of OCHA for the OPT, has likened the continuous mass displacement of Palestinians to “pawns in a board game” — forced from one location to the next, to the next [and] to the next, irrespective of our ability of support[ing] them and irrespective of the availability of services wherever they land.”⁸⁵ This comparison clearly paints an accurate picture, as journalist Hind Khoudary similarly describes how Palestinians across Gaza “feel like the Israelis are playing a chess game with them, moving them from one place to another, and no place is safe”. Those interviewed by Al-Haq expressed the very same, stating: “They told us this area is safe, but it is not, they bombed it . . . we do not know where to go . . . we have been displaced many times”.⁸⁶ A man, in the course of evacuating, explained: “We’ve been displaced from Gaza to Deir Al-Balah to Khan Younis to Rafah, to Al-Mawasi and back to Rafah again, we’re leaving now but do not know where to go. There is no place to go to. Everywhere is overcrowded. Safe places are being attacked.”⁸⁷

The immense sense of hopelessness Israel has purposely created, and its lasting adverse mental effects, are unimaginable. One can only begin to consider a reality in which you face attacks from air, land and sea, multiple forced displacements, starvation, disease and dehydration for over ten months, yet are again being ordered to evacuate. However, this is the reality of every Palestinian man, woman and child in Gaza. Hassan Morajea, Norwegian Refugee Council’s (NRC) regional access advisor, has expressed how:

People are living in a constant state of unpredictability, not knowing what is going to come next, be it more displacements, more relocations, or a regional escalation. All those worries are adding a level of emotional and psychological stress to the hardship already faced by people because of the lack of food and water, and the inability to provide shelter for their families.⁸⁸

As Amparo Villasmil, a psychologist with MSF, explains:

⁸³ Al-Haq Affidavit GZ017

⁸⁴ UN, Meetings Coverage and Press Releases, ‘As Civilians in Gaza Are Pushed into “Ever Deeper Circles of Hell”, Donors Must Act Now to Protect UN Palestine Refugee Agency, Secretary-General Urges Pledging Conference’ (12 July 2024) <<https://press.un.org/en/2024/sgsm22306.doc.htm>>

⁸⁵ UN News, Global Perspective Human Stories, ‘Gaza ‘split in two’ as civilians, humanitarian reset lives, aid efforts’ (3 July 2024) <<https://news.un.org/en/story/2024/07/1151751>>

⁸⁶ Al-Haq, Multiple Interviews with Palestinians on 28 May 2024 (no names provided, in Arabic) <<https://vimeo.com/1043129148/40e0ec4291?share=copy>>

⁸⁷ Al-Haq, Multiple Interviews with Palestinians on 28 May 2024 (no names provided, in Arabic) <<https://vimeo.com/1043129148/40e0ec4291?share=copy>>

⁸⁸ Norwegian Refugee Council, ‘On-the-record update #7 on situation in Gaza, Palestine’ (6 August 2024) <<https://www.nrc.no/news/2024/august/on-the-record-update-7-on-situation-in-gaza-palestine/>>

When we say that there is no safe place in Gaza today, we are not just talking about the shelling. *There isn't even a safe place in people's minds.* They live in a state of constant alert. They can't sleep, they think that at any moment they are going to die; that if they fall asleep, they won't be able to react quickly and run away, or protect their family.⁸⁹

Everyone in Gaza is tired. Davide Musardo, another psychologist with MSF who has attempted to help Palestinians address the various mental health symptoms they face while trying to survive a never-ending nightmare, recalls seeing people break down when receiving news of another evacuation order, saying “I won't move my tent any more, I might as well die.”⁹⁰ Strikingly, Musardo goes on to note how his patients all have expressionless faces; “faces that illustrate loss, sadness, and depression”.⁹¹ The faces “of people who have lost everything”.⁹²

Even prior to Israel's current genocidal assault on Gaza, Palestinians across the Gaza Strip suffered severe trauma from prior attacks. As Save the Children reports “[n]o child in Gaza has known life outside of interminable cyclical violence and a life-limiting land, air and sea blockade imposed by the Government of Israel”.⁹³ Every child has “repeatedly experienced or witnessed traumatic events and an evisceration of their most fundamental human rights” which have taken a devastating and compounding toll on their mental health and psychosocial wellbeing, even before the latest escalation.⁹⁴ Prior to 7 October 2023, 80 percent of Palestinian children experienced higher levels of emotional distress, demonstrating bedwetting (79 percent) and reactive mutism (59 percent), engaging in self-harm (59 percent), and having suicidal thoughts (55 percent).⁹⁵ By 2020, already half of Gaza's children had post-traumatic stress disorder (PTSD) from witnessing shelling, having their homes destroyed, or being physically injured in previous Israeli aggressions.⁹⁶ Just last year, the UN Security Council passed Resolution 2712, in which it expressed its “deep concern that the disruption of access to education has a dramatic impact on children, and that conflict has lifelong effects on their physical and mental health”.⁹⁷

Although an entire lifetime living under illegal occupation has left no child in Gaza mentally unscathed, all parents, caregivers and partners consulted by Save the Children reported that this escalation is unlike any that came before. Participants attributed this to “the intensity, duration

⁸⁹ MSF, “‘We dread nightfall’: Voices from Gaza’ (2 January 2024)

<<https://www.doctorswithoutborders.org/latest/we-dread-nightfall-stories-gaza>>

⁹⁰ MSF, ‘In Gaza, “everything is missing, even the idea of a future”’ (20 June 2024)

<<https://www.doctorswithoutborders.org/latest/gaza-everything-missing-even-idea-future>>

⁹¹ *Ibid*

⁹² *Ibid*

⁹³ Save the Children, *Trapped and Scarred: The Compounding Mental Harm Inflicted on Palestinian Children in Gaza* (2024) 2 <<https://resourcecentre.savethechildren.net/pdf/Trapped-and-Scarred-Final-1-1.pdf>>

⁹⁴ *Ibid*

⁹⁵ *Ibid*

⁹⁶ B El-Khodary, M Samara & C Askew, ‘Traumatic Events and PTSD Among Palestinian Children and Adolescents: The Effect of Demographic and Socioeconomic Factors’ (2020) 11 *Front Psychiatry* <<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7137754/>>

⁹⁷ UN Security Council Resolution 2712, The situation in the Middle East, including the Palestinian Question (15 November 2023) S/RES/2712

and conduct of hostilities; the widespread, systematic and repeated displacement; the lack of access to essentials necessary for survival; and the decimation of public services”.⁹⁸ After just five months, Save the Children reported that Israel’s genocidal war had caused “relentless mental harm to children in Gaza”, with parents and caregivers telling the organisation that “*children’s capacity to even imagine a future without war has virtually disappeared*”.⁹⁹ All fundamental tenets of childhood, such as a stable routine or the opportunity to learn and play, have been destroyed. Children have lost their homes, their friends — and for thousands, all their family. They are repeatedly displaced and have no safe place or sense of security capable of providing some much-needed comfort as they try to withstand methods and means of war designed to destroy everything and everyone.

Children are exposed to extremely traumatic episodes on a daily basis.¹⁰⁰ Due to the environment Israel has carefully curated, children are experiencing a whole host of signs and symptoms of trauma including anxiety, fear, worry about their safety and that of their loved ones, nightmares and disturbing memories, insomnia, bottling up emotions and withdrawing from loved ones.¹⁰¹ An Emergency Coordinator for MSF, interviewed on her return from five weeks in Gaza, described:

[I]t's even worse in reality than it looks. It's - the amount of suffering is just something... incomparable. It's really unbearable. I'm speechless when I try and think of the future of these children. It's generations of children who will be handicapped, who will be traumatised. The very *children in our mental health program are telling us that they would rather die than continue living in Gaza now*.¹⁰²

The extreme psychological toll of Israel’s evacuation orders and unrelenting massacre of Palestinians in Gaza has also manifested in hair loss for some children,¹⁰³ as a result of the body being in a constant state of fight-or-flight – except there is nowhere to flee to.

⁹⁸ Save the Children, ‘Trapped and Scarred: The Compounding Mental Harm Inflicted on Palestinian Children in Gaza (2024) 2 <<https://resourcecentre.savethechildren.net/pdf/Trapped-and-Scarred-Final-1-1.pdf>>

⁹⁹ Save the Children, “‘Complete psychological destruction’: Children in Gaza have suffered “relentless mental harm” during five months of war – Save the Children’ (12 March 2024) <<https://www.savethechildren.net/news/complete-psychological-destruction-children-gaza-have-suffered-relentless-mental-harm-during>>

¹⁰⁰ Save the Children, ‘Children’s mental health in Gaza pushed beyond breaking point after nearly a month of siege and bombardment’ (7 November 2023) <<https://www.savethechildren.org.uk/news/media-centre/press-releases/childrens-mental-health-in-gaza-deteriorates-one-month-on->>

¹⁰¹ *Ibid*

¹⁰² NPR, ‘An aid worker describes the ‘unbearable’ suffering of wounded children in Gaza’ (26 December 2023) <<https://www.npr.org/2023/12/26/1221743518/an-aid-worker-describes-the-unbearable-suffering-of-woundedchildren-in-gaza#:~:text=Palestinian%20health%20officials%20say%20in,trying%20to%20care%20for%20children>>

¹⁰³ Al Jazeera, ‘Palestinian girl describes losing her hair over war trauma’ (23 August 2024) <<https://www.aljazeera.com/program/newsfeed/2024/8/23/palestinian-girl-describes-losing-her-hair-over-war-trauma>>

Children are disproportionately affected by current events, as the threshold at which children suffer long term damage is lower and their capacity to recover or cope with such unimaginable trauma is lesser than that of an adult.¹⁰⁴ Nevertheless, the toll that Israel's settler-colonial, apartheid regime has taken on Palestinian adults is also immeasurable. Repeated exposure to "conflict and violence, including witnessing and experiencing housing demolition, combined with Israel's siege of Gaza since 2007" is directly associated with "high levels of psychological distress among Palestinians".¹⁰⁵ A study conducted by the World Bank in November 2022 found that 71 percent of the adult Palestinian population screened positive for depression, compared to 50 percent of Palestinians in the occupied West Bank.¹⁰⁶ Since 7 October, Palestinian adults in Gaza have been plunged to new depths of despair and hopelessness. As the UN Special Rapporteur on the OPT recognised in March, "[t]he survivors will carry an indelible trauma, having witnessed so much death, and experienced destruction, homelessness, emotional and material loss, endless humiliation and fear".¹⁰⁷ Having to flee at a moment's notice amidst the chaos of war, without telecommunications and electricity; navigating through streets lined with rubble, corpses, and injured civilians; dodging bombs and bullets in search of refuge; witnessing the systematic destruction of former homes or neighbourhoods; processing their separation from family members, with no information on their fate; stripped naked, blindfolded and subject to cruel, inhuman and degrading treatment; all while fighting starvation and disease, has pushed Palestinians in Gaza beyond their physical and mental limits. The emotional distress caused by each of these experiences has left parents and caregivers increasingly unable to cope.¹⁰⁸ Further, the support, services and tools they need to care for themselves and their families are increasingly out of reach, if not non-existent. This is taking a very real toll on Palestinians throughout the Gaza Strip, as evidenced by accounts of women committing suicide as a result of their desperate living conditions.¹⁰⁹

¹⁰⁴ Save the Children, 'Trapped and Scarred: The Compounding Mental Harm Inflicted on Palestinian Children in Gaza' (2024) 17 <<https://resourcecentre.savethechildren.net/pdf/Trapped-and-Scarred-Final-1-1.pdf>>

¹⁰⁵ A Faddoul, G Shannon, K Ashgar, Y Boukari, J Smith & A Neilson, 'The health dimensions of violence in Palestine: a call to prevent genocide' (The Lancet, 18 December 2023) <[https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(23\)02751-4/fulltext](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(23)02751-4/fulltext)> accessed 18 September 2025

¹⁰⁶ World Bank Group, International Security and Development Center, Zentrum Überleben, Palestinian Central Bureau of Statistics, 'Mental Health in the West Bank and Gaza' (22 November 2022) 7 <<https://documents1.worldbank.org/curated/en/099153502102330181/pdf/P17925303fca130e30936d016a378b6a1e9.pdf>>

¹⁰⁷ UN Human Rights Council, 'Anatomy of a genocide: Report of the Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967, Francesca Albanese' (1 July 2024) UN Doc A/HRC/55/73, para 27

¹⁰⁸ Save the Children, "'Complete psychological destruction': Children in Gaza have suffered "relentless mental harm" during five months of war – Save the Children' (12 March 2024) <<https://www.savethechildren.net/news/complete-psychological-destruction-children-gaza-have-suffered-relentless-mental-harm-during>> accessed 18 September 2025

¹⁰⁹ UN OHCHR, 'Observations from Gaza by Head of UN Human Rights office for the Occupied Palestinian Territory Ajith Sunghay' (19 July 2024) <<https://www.ohchr.org/en/statements/2024/07/observations-gaza-head-un-human-rights-office-occupied-palestinian-territory>>

Finally, the role of intergenerational trauma for Palestinians cannot be overlooked. The traumatic, life-changing events that this group has experienced pre-date the creation of the State of Israel, yet have continued unabated since the Nakba of 1948.¹¹⁰

Rather, the trauma is ongoing, relentless and compounding day by day. Though already dealing with the weight of historical, intergenerational and collective trauma, Palestinians are now being forced to survive in a landscape of total devastation. Israel's acts since 7 October are unparalleled — both in terms of the physical destruction it has wrought on Palestinians and in the extent of mental harm inflicted. A clear-cut case of genocide, Israel's attack on Gaza seeks to destroy the minds, bodies, lives, and culture of Palestinians in the Gaza Strip. Deprived of every source of happiness, stability or hope, Israel's conduct can only be classified as a calculated effort to inflict psychological devastation upon Gaza's population. They have stripped the entire population of any sense of safety, while at the same time forcing them to consistently relocate to “safe zones” — the conditions of each being worse than the last — where they know they will be targeted, just like they will be targeted if they stay. Either option means death, and deciding kills the mind.

III. Psychological Torture

a. Demolitions

On 24 November 2001, the UN Committee Against Torture (the Committee) stated that Israeli policies on Palestinian house demolitions may amount to cruel, inhuman or degrading treatment or punishment which States Parties undertake to prevent under Article 16 of the Convention.¹¹¹ The Committee's Concluding Observations in 2002 called on Israel to “desist from its policy of closures and house demolitions where they offend Article 16 of the Convention”.¹¹²

However, subsequent studies have revealed the long-term, detrimental impact of a person witnessing their home being demolished. In Israel, where the practice is widespread and systematic, the demolition of Palestinian homes for the purpose of discriminating against Palestinians; punishing Palestinians for an act they are suspected to have committed; or intimidating or coercing Palestinians, our organisations submit that it amounts to psychological

¹¹⁰ Gabor Maté, a Jewish Holocaust survivor and renowned author, speaker, and physician — specialising in stress, trauma, addiction, and childhood development — has vocalised the semblance between his own experience as a child in Hungary and that of Palestinian children:

Palestinians have been oppressed and suppressed and murdered and controlled and dispossessed for decades. That's just the truth. There's no post-traumatic stress disorder here, because the trauma is never post.

See Where Olive Trees Weep (2024) <<https://whereolivetreesweep.com/>>

¹¹¹ UN Committee Against Torture, ‘Report of the Committee against Torture Twenty-seventh session (12-23 November 2001) Twenty-eighth session (29 April-17 May 2002)’ UN Doc A/57/44, 29

¹¹² Conclusions and Recommendations of the Committee against Torture: Israel, CAT/C/XXVII/Concl.5, 23 November 2001, para7(g)

torture, as defined by Article 1, due to the “severe pain or suffering”¹¹³ intentionally inflicted on the person.

A 2024 study aimed to measure the prevalence of Post-Traumatic Stress Disorder (PTSD), depression, anxiety, and stress among Palestinian citizens whose homes were demolished found that participants who had their homes demolished had an overall PTSD mean score of 3.2, which indicates PTSD as a clinical concern.¹¹⁴ A study examining PTSD among Lebanese and Palestinians in Gaza who had their homes demolished showed similar high results of PTSD.¹¹⁵ Almost a quarter of the 2024 study sample showed symptoms of PTSD, and PTSD levels in females were higher than that in males. Similarly, a variation in the levels of anxiety, depression, and stress was recorded between genders, and compared to the comparison group, stress, anxiety, and depression scores were significantly higher among the demolition group who recorded severe levels of stress and extremely severe levels of both depression and anxiety. In the demolition group, children younger than 15 years old had the highest scores of PTSD where the symptoms were high enough to suppress the immune system’s functioning.¹¹⁶

A study carried out in relation to the Palestinian Bedouin community reached the same conclusions, noting women who are at risk of losing their homes suffered from higher rates of depression than those who are not at risk.¹¹⁷ Another study, also involving the Bedouin community, showed that the demolition of a home causes double the amount of stress for adolescents compared to those whose homes had not been destroyed.¹¹⁸ These results indicate the importance of homes, which represent the protective shield against the world, and how destroying them participates in developing PTSD and other mental disorders.¹¹⁹

¹¹³ Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment 1984, Article 1

¹¹⁴ AL Sarhan, K Jarrar, S Atout & W Masri, ‘Post traumatic stress disorder and co-morbid psychological disorders after Palestinians’ home demolition: a comparative study’ (2024) 15 Front Psychiatry
<<https://pmc.ncbi.nlm.nih.gov/articles/PMC11466762/>>

¹¹⁵ Approximately 29.8 percent of adolescents ($n = 179$) reported having experienced at least one high-magnitude traumatic event in their lifetime due to war. Of the total sample, 119 (19.8 percent) involved a family member being killed, 75 (12.5 percent) a family member being injured, and 82 (13.6 percent) had had their house demolished. See V Khamis, ‘Impact of war, religiosity and ideology on PTSD and psychiatric disorders in adolescents from Gaza Strip and South Lebanon’ (2012) 74 Social Science & Medicine
<<https://www.sciencedirect.com/science/article/abs/pii/S0277953612001992?via%3Dihub>>

¹¹⁶ AL Sarhan, K Jarrar, S Atout & W Masri, ‘Post traumatic stress disorder and co-morbid psychological disorders after Palestinians’ home demolition: a comparative study’ (2024) 15 Front Psychiatry
<<https://pmc.ncbi.nlm.nih.gov/articles/PMC11466762/>>

¹¹⁷ N Daoud & Y Jabareen, ‘Depressive Symptoms Among Arab Bedouin Women Whose Houses are Under Threat of Demolition in Southern Israel: A Right to Housing Issue’ (2014) 16 Health and Human Rights Journal 179 <<https://content.sph.harvard.edu/wwwhsph/sites/2469/2014/06/Daoud1.pdf>>

¹¹⁸ O Braun-Lewensohn, S Sagy & H Al Said, ‘Stress Reactions and Coping Strategies among Bedouin Arab Adolescents Exposed to Demolition of Houses’ (2013) 30 Stress & Health
<<https://onlinelibrary.wiley.com/doi/10.1002/smi.2519>>

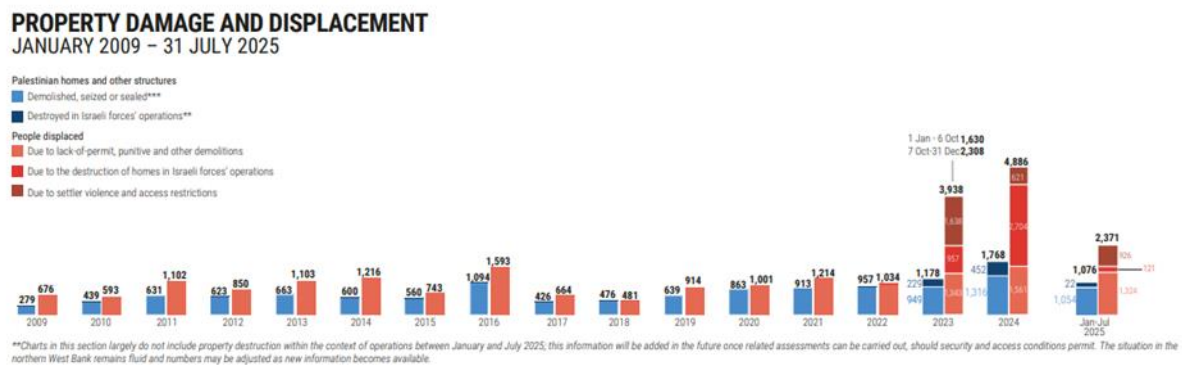
¹¹⁹ S Qouta, R-L Punamaki & E El Sarraj, ‘Prevalence and determinants of PTSD among Palestinian children exposed to military violence’ (2003) 12 European Child & Adolescent Psychiatry
<<https://link.springer.com/article/10.1007/s00787-003-0328-0>>

These findings are confirmed by a 2021 literature review which considered nine studies related to mental health consequences of home demolition:

The results indicate depression, stress, anxiety, phobias and lack of hope in the future are mutual themes running throughout the lives of those Palestinian families who have actually experienced home demolition along with those who have experienced a constant threat of demolition to their homes. In addition, many of life stressors such as lack of educational opportunities, low incomes, and a tendency to live in poor housing conditions after and before demolition also play a role in developing serious mental disorders.¹²⁰

Israel's widespread and systematic practice of home demolitions

Since 1967, the IOF has routinely demolished Palestinian homes in the OPT. However, since the second intifada began in September 2000, the practice of home demolitions, forced expulsion and land seizures has increased dramatically. Post Operation Al-Aqsa Flood, rates of home demolitions have reached unprecedented levels.



^ UN OCHA, 'West Bank Monthly Snapshot - Casualties, Property Damage and Displacement | July 2025' (22 August 2025)
<<https://www.ochaopt.org/content/west-bank-monthly-snapshot-casualties-property-damage-and-displacement-july-2025>>
accessed 18 September 2025

i. The West Bank

Land confiscation and mass demolition of Palestinian homes and structures in the unlawfully occupied West Bank, including East Jerusalem is a predominant practice and a cardinal part of Israel's Zionist settler colonial apartheid regime that aims to eliminate and replace Palestinians with Israeli-Jews.

Israel employs a discriminatory planning and zoning regime to quell Palestinian construction, forcibly transfer Palestinians and alter the OPT's demographic composition and further

¹²⁰ M Marie & S SaadAdeen, 'Mental health consequences of home demolition policy towered Palestinians: Literature review' (2021) 15 International Journal of Mental Health Systems
<<https://ijmhs.biomedcentral.com/articles/10.1186/s13033-021-00472-0#:~:text=In%20this%20review%2C%20nine%20studies,in%20developing%20serious%20mental%20disorders>>

fragment its territory. Israel unlawfully amended the operative Jordanian law governing Palestinian planning and zoning under military order, to introduce a new discriminatory planning system, which is unlawful in its entirety.¹²¹ This includes the practice of “administrative demolitions” premised on the sole ground of lacking a building permit, which are by design impossible for Palestinians to obtain.¹²²

The IOF has provided several reasons for Israel’s practice of forcibly displacing Palestinian men, women and children and demolishing their property and appropriating their land – one being the need to create “buffer zones” in the OPT. In actual fact, the IOF’s home demolitions are part of a broad-reaching practice of collective punishment through demographic engineering. Through home demolitions, indigenous Palestinians are forced to move from areas deemed strategic or of interest to Israel and displaced from the land where they and their ancestors have lived and made their livelihoods.¹²³

On 11 November 2024, Israel’s far-right Finance Minister, Bezalel Smotrich, met with his far right faction at the Israeli Parliament and announced his intention to lead “the government of Israel [to] work with the new administration of President Trump and the international community to apply Israeli sovereignty over [the West Bank]”.¹²⁴ To this end, he instructed the Settlement Administration at the Defence Ministry and the Civil Administration to lay the groundwork for annexation and prepare the necessary infrastructure to apply Israeli sovereignty over the West Bank.¹²⁵ This is in line with the Israeli Government’s guiding principles of 2022, which pledged to lead to the formulation and promotion of a policy to extend Israeli sovereignty over the West Bank.¹²⁶

On 19 July 2024, the International Court of Justice (ICJ) released a landmark Advisory Opinion finding that Israel’s presence in OPT is unlawful, and that its policies and practices “entrench Israel’s control of the Occupied Palestinian Territory, notably of East Jerusalem and of Area C

¹²¹ Diakonia, ‘Planning to Fail: The planning regime in Area C of the West Bank: An International Law Perspective’ (2013) 14 <<https://apidiakoniasse.cdn.triggerfish.cloud/uploads/sites/2/2021/07/planning-regime-west-bank-international-law.pdf>>

¹²² Administrative demolition orders concern ongoing constructions, new constructions (completed less than 60 days prior to the demolition order), uninhabited buildings or buildings inhabited for less than 30 days prior to the issuing of the demolition order. See Al-Haq, *House Demolitions and Forced Evictions in Silwan- Israel’s Transfer of Palestinians from Jerusalem* (2020) 29-30 <https://www.alhaq.org/cached_uploads/download/2021/08/17/silwan-webversion-1-page-view-1629184473.pdf>

¹²³ See Center for Constitutional Rights, ‘Factsheet: Home Demolitions and Caterpillar’ (17 October 2007) <<https://ccrjustice.org/home/get-involved/tools-resources/fact-sheets-and-faqs/factsheet-home-demolitions-and-caterpillar>>

¹²⁴ Michael Hernandez, ‘What Trump’s second term could mean for the Middle East’ (Anadolu Ajansi, 15 November 2024) <<https://www.aa.com.tr/en/americas/what-trump-s-second-term-could-mean-for-the-middle-east/3394966>>

¹²⁵ Al Jazeera, ‘Israel’s Smotrich orders prep work for annexation of occupied West Bank’ (11 November 2024) <<https://www.aljazeera.com/video/newsfeed/2024/11/11/israels-smotrich-orders-prep-work-for-annexation-of-occupied-west-bank>>

¹²⁶ Adalah, ‘Adalah’s Analysis of the New Israeli Government’s Guiding Principles and Coalition Agreements and their Implications on Palestinians’ Rights’ (10 January 2023) <https://www.adalah.org/uploads/uploads/Position_Paper_New_Government_19_April_2023.pdf>

of the West Bank”, and “are designed to remain in place indefinitely and to create irreversible effects on the ground”, hence they “amount to annexation of large parts of the Occupied Palestinian Territory.”¹²⁷ More specifically, the Court found that Israel’s policies and practices of forcible evictions, extensive house demolitions and restrictions on residence and movement “indicate that [these] measures are not temporary in character and therefore cannot be considered as permissible evacuations,” and amount to forcible transfer.¹²⁸

Between 7 October 2023 and 20 May 2024, the Israeli authorities and settlers demolished or damaged around 415 Palestinian homes throughout the occupied West Bank, including Jerusalem, forcibly displacing 1,335 Palestinians, 45 percent of whom are children, according to Al-Haq’s documentation.¹²⁹ By September 2024, Israeli authorities demolished 1,277 Palestinian-owned structures, including 459 inhabited residential buildings and 62 donor funded structures. As noted by the UN Secretary-General Guterres in his latest report on settlement activity in the OPT:

This represents a sharp increase from 1,056 structures demolished and 1,194 displaced in the same period between 2022 and 2023, and represents the highest numbers recorded since 2009.¹³⁰

Between 1 January and 1 September 2025, OCHA documented the demolition of 1,151 structures across the West Bank for lacking Israeli-issued building permits, which are almost impossible to obtain. These included 274 inhabited homes, 60 uninhabited residential structures, 607 agricultural or livelihood structures, 138 water and sanitation structures, and 70 other structures. Eighty-five per cent of demolished structures were in Area C, 14 percent in East Jerusalem, and one percent (mainly water wells) in Areas A or B.¹³¹ Home demolitions in Area C due to the lack of Israeli-issued building permits displaced nearly 900 Palestinians so far in 2025, representing a 39 percent increase compared with the corresponding period in 2024 and more than double the figure in the same period in 2023.¹³² In total, nearly 1,300 Palestinians were displaced and more than 37,000 were otherwise affected. Compared with the corresponding period in 2024, this marks a 44 percent increase in demolished structures (797 vs. 1,151) and a 31 percent increase in displacement (991 vs. 1,298).¹³³

¹²⁷ ICJ, Legal Consequences arising from the Policies and Practices of Israel in the Occupied Palestinian Territory, including East Jerusalem, 19 July 2024, para. 173

¹²⁸ ICJ, Legal Consequences arising from the Policies and Practices of Israel in the Occupied Palestinian Territory, including East Jerusalem, 19 July 2024, para. 147

¹²⁹ Al-Haq, ‘76 Years of Ongoing Nakba: Israeli Colonial Violence Through the Eyes of Palestinian Children, Beaten and Used as Human Shields in West Bank Refugee Camps’ (22 May 2024) <<https://www.alhaq.org/advocacy/23129.html>>

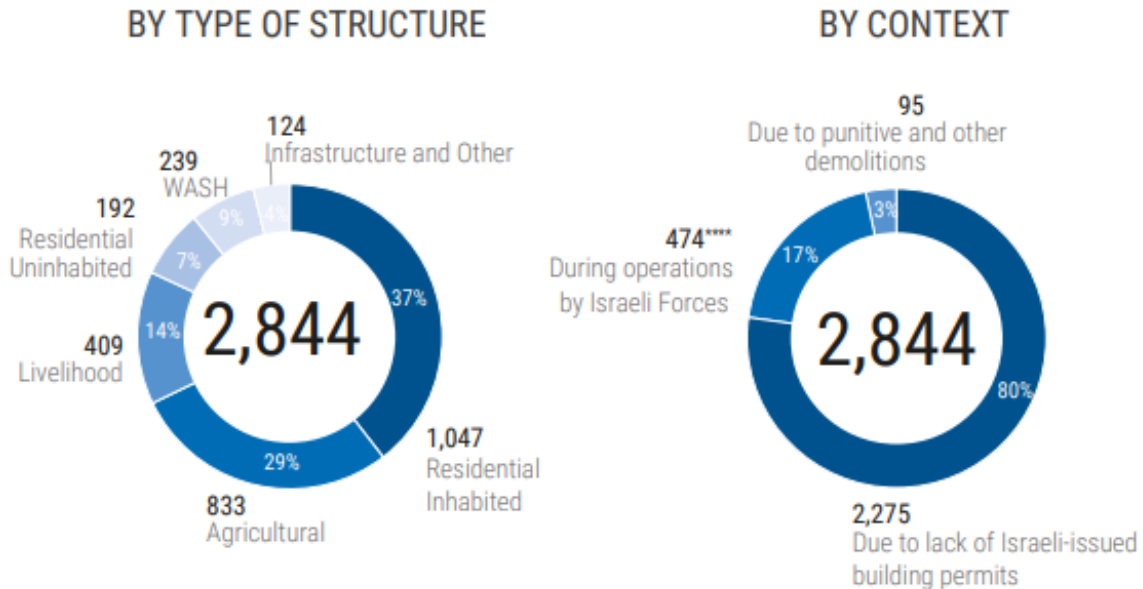
¹³⁰ UN General Assembly, Israeli settlements in the Occupied Palestinian Territory, including East Jerusalem, and the Occupied Syrian Golan: Report of the Secretary-General (12 September 2024) UN Doc. A/79/347, para 33.

¹³¹ UN OCHA, ‘Humanitarian Situation Update #320 | West Bank’ (4 September 2025) <<https://www.ochaopt.org/content/humanitarian-situation-update-320-west-bank>>

¹³² UN OCHA, ‘Humanitarian Situation Update #318 | West Bank’ (28 August 2025) <<https://www.ochaopt.org/content/humanitarian-situation-update-318-west-bank>>

¹³³ UN OCHA, ‘Humanitarian Situation Update #320 | West Bank’ (4 September 2025) <<https://www.ochaopt.org/content/humanitarian-situation-update-320-west-bank>>

STRUCTURES DEMOLISHED (ALL CONTEXTS) 1 JANUARY 2024 - 31 JULY 2025



^ UN OCHA, 'West Bank Monthly Snapshot - Casualties, Property Damage and Displacement | July 2025' (22 August 2025) <<https://www.ochaopt.org/content/west-bank-monthly-snapshot-casualties-property-damage-and-displacement-july-2025>> accessed 18 September 2025

Punitive demolitions

Demolitions as punishment for alleged crimes and acts of resistance take place often, as supported by affidavits gathered by Al-Haq. The present submission has chosen to present evidence gathered from 2023 onwards, however this practice – like the other categories listed below – predates this temporal scope.

A striking example of this is a 2021 incident documented by Al-Haq. Over a 17-month period, Al-Haq monitored how Israeli officials allowed for the rapid expansion of settlement infrastructure while Palestinian communities were deliberately deprived, denied water access, electricity, and roads. When Palestinians attempted to adapt to this coercive environment by creating solutions, such as using water tanks and solar panels, Israeli authorities invoked military orders, such as Order 1252 which allows for the confiscation of 'movable structures' under the pretext of lacking the required permits. The brutality of these policies within Israel's settler-colonial apartheid system was showcased when an Israeli soldier shot H.A.A. at point-blank range for trying to retrieve an electricity generator that they had confiscated from him in January 2021. The bullet left him paralysed. One month after he was attacked, his home in the

village of Al-Rakiz in Masafer Yatta was also demolished in a clear act of punishment for simply trying to survive under Israel's violent unlawful occupation.¹³⁴

On 6 July 2023, A.Y. was martyred after allegedly carrying out an operation at the Kadumim settlement near Qalqiya. On the same day, during the night, IOF soldiers stormed the house of A.Y.'s father, H.M.A.H.G., in the village of Qabya. The IOF soldiers verbally threatened to demolish it and took measurements of the home in addition to drilling holes in the walls to measure their thickness. They also tampered with and vandalised the contents of the home. As punishment for the alleged acts of his son, on 17 August 2023, Aluf Yehuda Fuchs, the military commander of the Israeli occupation army in the West Bank, issued a decision to demolish H.M.A.H.G.'s home. Despite seeking support from Hamoked, on 5 October 2023, the Israeli Supreme Court issued a final order to demolish and confiscate the house. The family, which included H.M.A.H.G., his wife and eight children, were given until 22 October 2023 to carry out the demolition. However, as H.M.A.H.G. later learned, the Israeli Public Prosecutor's Office appealed the decision to expedite the demolition process, which it succeeded in doing on 18 October 2023.

At 2:00 a.m. on 19 October 2023, two days after beginning a raid on Qabya in which the IOF brought demolition equipment consisting of two military bulldozers, according to eyewitnesses, two buses arrived at the home of H.M.A.H.G. transporting soldiers. Approximately 100 IOF soldiers spread around the house, with some climbing on to the roof and positioning snipers. The family quickly left the house. By 3:00 a.m. two military bulldozers arrived and carried out the demolition, which lasted until 5:30 a.m., completely destroying their home. In light of Operation Al Aqsa Flood, on 7 October 2023, H.M.A.H.G. considered the expedited demolition – which was already a punitive action – to be a further act of revenge and collective punishment against him and his family to be considered in the context of Israel's genocide against Palestinians in the Gaza Strip.¹³⁵ It is important to note that H.M.A.H.G. built his house in a series of intermittent construction phases in 1992 and has had a building permit since 1988. Despite the work put into its construction, and being authorised by the Israeli occupation, the Supreme Court decision includes confiscation and demolition, H.M.A.H.G. is prohibited from removing the rubble and rebuilding on the same site.

Another incident depicting Israel's routine practice of psychological torture against Palestinians is the 9 January 2024 demolition of F.K.A.R.B.'s family home in the Damaj neighbourhood of the Old Askar Camp, east of Nablus. IOF soldiers violently stormed the home looking for F.K.A.R.B.'s son, who had fled prior to their arrival, ransacking the contents of the house before detaining the family in the living room. F.K.A.R.B.'s husband, the father of the family was physically assaulted, and dragged out of the house in his sleepwear to be interrogated. During their detention in the living room, which lasted 1.5 hours, F.K.A.R.B.'s children were terrified as Israeli soldiers searched the rooms and sexually assaulted their mother by holding F.K.A.R.B. at gunpoint and forcing her to lift her blouse and reveal her body underneath. No one was allowed to move, go to the bathroom, or even have a drink of water. At a certain point,

¹³⁴ Al-Haq, 'Erasure in Motion: Israel's Forcible Displacement of West Bank Bedouin Communities' (01 April 2025) <<https://www.alhaq.org/FAI-Unit/26161.html>>

¹³⁵ Al-Haq Affidavit 2023-10-01085-RB-D-A1-IL-DIS, taken from H.M.A.H.G., resident of Qabya

F.K.A.R.B. noticed a soldier stretching black wire around the house in preparation for its demolition.¹³⁶

In an attempt to obtain custody of her son, they dragged F.K.A.R.B.'s husband outside to call out for him as the IOF threatened to blow up the family home and kill her husband. When her son surrendered himself to the Israeli soldiers, they brought him into the house where F.K.A.R.B. and her family could hear him being interrogated, beaten and framed with a weapon he did not own. After about 30 minutes, the family was forced to leave their home as they were told it was going to be demolished in a clear retaliatory act of punishment. F.K.A.R.B. and her family left the house and walked towards the main street, stopping at a distance of about 50-70 metres and watched as their son was taken away just a minute later. IOF soldiers then instructed the family to go to a neighbour's house to take shelter from the demolition. After about 15-20 minutes, at around 9:30 a.m., F.K.A.R.B. heard a single explosion so loud that she felt the neighbour's house shake. At around 9:45 a.m., the IOF withdrew from the house and left the old Askar camp leaving her home engulfed in flames. The punitive demolition destroyed all rooms in the house, along with its contents, thereby leaving the family forcibly displaced.¹³⁷

Demolitions during IOF raids

Between 7 October 2023 and 6 October 2025, 999 Palestinians were killed in the West Bank, including East Jerusalem. About half of the 967 fatalities caused by the IOF were recorded in Jenin and Tulkarm governorates.¹³⁸ As reported by UN OCHA:

Israeli forces continued to carry out operations across cities, towns, and villages in the northern West Bank, with a marked intensification since 25 September in Jenin city as part of the ongoing Israeli forces' operation in the area since January 2025.¹³⁹

The residents of Jenin city and refugee camp have been plunged into a state of constant fear and anxiety due to relentless Israeli raids, which feature purposeful destruction of critical infrastructure and housing units.

R.R.R.F. lives in the Al-Damaj neighbourhood of Jenin refugee camp. On 28 November 2023, the sirens in the camp alerted the residents of an Israeli military attack on the camp. R.R.R.F.'s daughter and niece left the camp immediately due to the extreme fear they experience whenever the IOF launch a raid, knowing that Al-Damaj is always targeted. The following day, 29 November 2023, as the intensity of the raid increased and gunfire was drawing nearer, at around 5:00 a.m., R.R.R.F.'s phone rang. The caller was an Israeli intelligence officer who spoke introduced himself in Arabic as 'Captain Iyad' and asked was she home. After informing him that she was at her sister's house, which was visible from her own home, Captain Iyad informed

¹³⁶ Al-Haq Affidavit 2024-01-050-NA-D-A1-IL-DIS, taken from F.K.A.R.B., resident of Old Askar camp

¹³⁷ Al-Haq Affidavit 2024-01-050-NA-D-A1-IL-DIS, taken from F.K.A.R.B., resident of Old Askar camp

¹³⁸ UN OCHA, 'Humanitarian Situation Update #330 | West Bank' (9 October 2025)

<<https://www.ochaopt.org/content/humanitarian-situation-update-330-west-bank>>

¹³⁹ UN OCHA, 'Humanitarian Situation Update #330 | West Bank' (9 October 2025)

<<https://www.ochaopt.org/content/humanitarian-situation-update-330-west-bank>>

R.R.R.F. that “armed people” were in her home and this was filmed by Israeli drones – the sound of which is familiar to those in Jenin camp. Despite R.R.R.F. denying that there were any armed men in her home, Captain Iyad insisted there were before simply hanging up the phone. As soon as he hung up, a very loud explosion was heard that shook the R.R.R.F.’s sister’s house where she was taking shelter, causing the windows to shatter and dust to fill the room. This was followed by another explosion of the same force, which increased the spread of dust and caused them to believe that the house had been targeted, causing them to experience “moments of real terror that cannot be described in words” compounded by the fact that the Palestinian Civil Defence and Palestinian Ambulance Service could not reach the Al-Damaj neighbourhood due to a tight military siege and the occupation's refusal to allow anyone access.¹⁴⁰

It was in this context that R.R.R.F. realised her home had been bombed. Stones from her own home had been blown into the adjacent home of her sister. Until the IOF left the area at around 12:30 p.m. that day, R.R.R.F. could not leave and go to the ruins of her home, which she then discovered has been completely destroyed by the bombing. Her sister, R.F.’s home had also been damaged, along with many of the houses adjacent to and above her own. After the traumatic event, an Israeli military bulldozer arrived to complete the destruction of the already damaged or demolished houses. R.R.R.F. could hear its noise during the period preceding the withdrawal of Israeli soldiers from the Al-Damaj neighbourhood, causing further distress. She is now staying in the damaged home of her sister.¹⁴¹

Demolitions related to building permits

Demolitions based on a lack of a building permit, which are almost impossible to obtain, represent the most common “basis” for demolitions of Palestinian homes. For example, between 2016 and 2018, Israeli authorities issued 100 times more demolition orders than building permits for Palestinians living in the West Bank.¹⁴² Demolition orders have only increased, as Israel cements its apartheid regime and illegal presence in the occupied West Bank.

Al-Haq has a large database of evidence on incidents of Israel demolishing Palestinian homes on the grounds of a lack of a building permit. A.R.N.Q.’s family owns land in Wadi Al-Makhroun area, yet have been subjected repeated demolitions along with settler violence carried out with the support of the IOF in an effort to forcibly displace them from their land. She relayed to Al-Haq:

I live with my family in the Makhroun area. My grandparents were born and lived here before 1967, after being displaced in 1948. My mother, [M.L.Q.], is from the village of Ein Karem in Jerusalem, whose residents were displaced in 1948. The land my family

¹⁴⁰ Al-Haq Affidavit 2023-11-1318-JN-K-A1-IL-NTG, taken from R.R.R.F., resident of Jenin camp

¹⁴¹ Al-Haq Affidavit 2023-11-1318-JN-K-A1-IL-NTG, taken from R.R.R.F., resident of Jenin camp

¹⁴² Lama Fakih & Omar Shakir, ‘Does Israel’s Treatment of Palestinians Rise to the Level of Apartheid?’ (5 December 2023) <<https://www.hrw.org/news/2023/12/05/does-israels-treatment-palestinians-rise-level-apartheid>>

owns falls within Area C and is also a UNESCO World Heritage Site, since it is a nature reserve and contains Roman remains.

Since 2005, A.R.N.Q. and her family have endured state-backed settler violence. In 2012, Israeli authorities demolished the family's restaurant, under the pretext that it was built without a valid permit. The family rebuilt the restaurant, but Israel repeatedly rejected their permit application, and their restaurant was demolished several times in 2013, 2015, and 2019. Israeli authorities have further demolished 15 tents erected by her family between 2019 and 2023. Against these violations, A.R.N.Q. stressed:

*There is no dispute over the ownership of the land, as my family possesses property registration documents from the Civil Administration.*¹⁴³

More recent incidents include that of F.M.F.M., who was apprehended by armed IOF soldiers from his workshop on 5 March 2024 and brought to his house as it was going to be immediately demolished. F.M.F.M. informed the soldiers he had received a decision to halt construction of the house on 26 January 2021, but was pursuing legal action in the Beit El court in Ramallah. This went ignored, and instead they merely asserted that his home was on Israeli state land and he would not be given a building permit on this basis – which meant that he was breaking the law. The Israeli officer told F.M.F.M. that he had only two to five minutes to evacuate the house of its residents, meaning his family (that had received no advance notice). In a state “of confusion and shock”, F.M.F.M. attempted to evacuate the house of its contents in the minutes before the IOF stormed his house, accompanied by about 20 workers wearing uniformed yellow vests, masks covering their faces, and hats on their heads. After about 10 minutes, F.M.F.M. and his family were forcibly removed from the house at gunpoint, only managing to take some clothes and electronics with them.

After their removal, F.M.F.M. saw three bulldozers arrive, two of which were large Hyundai bulldozers with long arms and pointed heads, running on iron chains, and a third bulldozer, a yellow Caterpillar with a front bucket, running on rubber tyres. F.M.F.M. and his son were subsequently questioned by Israeli soldiers on the grounds that he had objected to the violent demolition being carried out without prior warning. F.M.F.M. asked:

*Where will I take them after you demolish the house? Why do you want to demolish the carpentry workshop, which is my main and only source of income, and from which I support my family? [...] During the conversation, the Israeli officers offered me to sell the house to the Israelis.*¹⁴⁴

During the demolition, the occupation soldiers forced F.M.F.M. to take refuge in a neighbour's house and stay away from the demolition, but they watched their house being demolished in front of them. F.M.F.M. described the “great pain and anger” he felt knowing he was unable to stop the demolition. At around 12:00 p.m. the same day, the occupation forces withdrew from

¹⁴³ Al-Haq, ‘Field Focus: Strategic Land Theft and Forced Displacement in Al-Makhrou – UNESCO Site Under Threat’ (18 April 2025) <<https://www.alhaq.org/monitoring-documentation/26315.html>>

¹⁴⁴ Al-Haq Affidavit 2024-03-110-NA-D-A1-IL-DIS, taken from F.M.F.M., resident of Jabal Al-Tur

the area surrounding the house, which had been razed to the ground and turned into piles of rubble.¹⁴⁵

On 3 June 2024, Israeli forces arrived in front of A.H.A.A.AA.'s house accompanied by bulldozers and began demolishing the house after giving him only about half an hour to evacuate some of the contents. The house had just been completed and was ready for occupancy. It therefore contained some belongings, especially as A.H.A.A.AA. was preparing to get married and live there.

*Everything happened suddenly and quickly, without any prior notice to me personally or to the village council. Israeli soldiers imposed a tight military cordon around the house and refused to allow anyone to approach it.*¹⁴⁶

The two bulldozers then began the demolition of the house, which lasted for about two hours and ended with the complete destruction of the house which was levelled to the ground.¹⁴⁷

Following a notice to halt building and construction of his home in Sweika, Tulkarm, and attempts to appeal the notice, on 8 July 2024, S.A.H.I.AM. was shocked to find Israeli military forces accompanied by three bulldozers and members of the occupation's Building Regulation Department surrounding his house. S.A.H.I.AM. and his family were given less than 30 minutes to leave their home and take their belongings and their cattle. S.A.H.I.AM.'s home that housed him and his family, along with their cattle barn and large greenhouses owned by a farmer renting land from Sofian were all bulldozed and entirely destroyed.¹⁴⁸ Describing the traumatic, unexpected event to Al-Haq, and his situation as a result, S.A.H.I.AM stated:

Israeli military bulldozers began carrying out the demolition, during which my home was destroyed before my very eyes.

*The Israeli forces withdrew from the site, leaving me, my wife, and my wife's children without shelter. We have since moved into a small iron container located next to our demolished house. It's very small and doesn't contain a bathroom or a kitchen [...] Some of us sleep at night under the trees near the house and the container [...] Our living conditions have become unbearable [...] my sheep are now exposed in the open and may die at any moment due to the current extreme high temperatures.*¹⁴⁹

Y.H.R.Z.'s home was also demolished in a similar set of facts, this time in Tura, Jenin. Following a notice to halt building and construction, and attempts to appeal the notice, on 24 September 2024 Y.H.R.Z. found military forces accompanied by three bulldozers and members of the occupation's Building Regulation Department besieging his house. Y.H.R.Z.'s wife and their 3-year-old daughter were inside at the time, but were forced to leave while Y.H.R.Z. was

¹⁴⁵ Al-Haq Affidavit 2024-03-110-NA-D-A1-IL-DIS, taken from F.M.F.M., resident of Jabal Al-Tur

¹⁴⁶ Al-Haq Affidavit 2024-06-235-JN-D-A1-IL-DIS, taken from A.H.A.A.AA., resident of Jalboun

¹⁴⁷ Al-Haq Affidavit 2024-06-235-JN-D-A1-IL-DIS, taken from A.H.A.A.AA., resident of Jalboun

¹⁴⁸ Al-Haq Affidavit 2024-07-320-TK-D-T1-IL-DIS, taken from S.A.H.I.AM., resident of Sweika

¹⁴⁹ Al-Haq Affidavit 2024-07-320-TK-D-T1-IL-DIS, taken from S.A.H.I.AM., resident of Sweika

being detained by the IOF nearby. Y.H.R.Z. explained that as he had tried to reach his family inside the home:

[S]everal soldiers physically assaulted me, beating and pushing me, while my wife and daughter had been forcibly removed from the home [...] The soldiers threatened us at gunpoint and forced my wife and me to leave the house and move away.

Despite pleading and presenting his arguments to the occupation soldiers at the scene, Y.H.R.Z. and his wife were allowed less than 15 minutes to take necessities and their belongings, including their important documents, before their home was to be demolished. Y.H.R.Z. and his family's newbuild home was then immediately bulldozed and completely destroyed right in front of them.¹⁵⁰

I.A.A.R. and his brother built a two-storey house to live in with both their families in Jaba', Jenin. After receiving a demolition notice and appealing it, I.A.A.R. and his brother discovered IOF forces, again accompanied by three bulldozers and members of the occupation's civil administration, were raiding their neighbourhood to demolish their shared home without notice while his brother and his family were inside. Prior to being forced to leave, soldiers had already begun throwing their furniture outside while sound grenades at were hurled at them. I.A.A.R. described to Al-Haq how his brother was shot in the leg for objecting the demolition and was denied proper medical treatment:

*I was standing close to my brother Khalil when he was shot and fell to his face. The soldiers prevented us from getting close to him, and he was left bleeding on the ground face down.*¹⁵¹

The IOF even held the ambulance and prevented anyone from assisting him. The brother's newly built home was bulldozed and entirely destroyed, with their valuable belongings left inside. Occupation forces also destroyed a water well and other infrastructure built by the brothers.¹⁵²

Also in Jaba' and on the same day as I.A.A.R. and his brother's home was demolished without notice, 3 April 2025, I.H.I.AK.'s home was also demolished without prior warning. I.H.I.AK. and his family had already been forcibly displaced by Israel's demolition of their previous home, but had managed to buy a house in a nearby area. They invested in this home, adding an extension to fit his family, his brother's family and his mother and two younger siblings. I.H.I.AK. received a demolition notice pertaining the extension he added and a cattle barn he built after purchasing the house. After receiving the notice and appealing it, I.H.I.AK. and his family found military forces, along with two bulldozers and members of the occupation's civil administration, besieging their home in preparation for the demolition process. The family was forcibly evacuated, barely allowing time for women to cover up, leaving them outside in their sleepwear. They were not allowed to take any of their belongings with them, only further evincing the cruelty of the IOF and their intent to inflict mental suffering on Palestinians.

¹⁵⁰ Al-Haq Affidavit 2024-09-468-JN-D-A1-IL-DIS, taken from Y.H.R.Z., resident of Tura

¹⁵¹ Al-Haq Affidavit 2025-04-147-JE-D-T1-IL-NTG, taken from I.A.A.R., resident of Jaba'

¹⁵² Al-Haq Affidavit 2025-04-147-JE-D-T1-IL-NTG, taken from I.A.A.R., resident of Jaba'

I.H.I.AK. and his family's home and barn were then bulldozed and entirely destroyed, with all valuable possessions left inside, barely allowing I.H.I.AK. to evacuate the cattle. In recounting the event, I.H.I.AK. stated:

*The demolition continued for approximately two hours before the occupying forces withdrew. I had to send the women and children to relatives' homes and move the sheep to the care of relatives and acquaintances, while I sat on the rubble of my house, confused and at a loss for what to do.*¹⁵³

The desperation, despair and grief experienced by I.H.I.AK., after his home was demolished for a second time with no hope of reparation or accountability, is unimaginable. Similar sentiments of hopelessness and despair were expressed by K.A.Y.Q. following multiple illegal settler attacks on his property in Umm Saffa which uprooted trees surrounding his home and blocked the road leading to his house. On 9 July 2025, K.A.Y.Q. learned his house was being demolished and witnessed settlers destroying the property from a nearby hill – though unable to access his own land. He said to Al-Haq:

By 10:30 a.m., the demolition of the house had been completed, and the forces had left. I do not know exactly how long the demolition lasted, as it may have begun before I became aware of it. What is certain is that everything was destroyed within moments, while I stood powerless and unable to do anything.

I was unable to approach the area as accessing it was extremely dangerous [...] I helplessly watched from a distance as my house was demolished before my eyes, unable to do anything to stop it [...]

They [the settlers] are constantly present on my land and regularly trespass it to graze their sheep, as if it has become theirs. This ongoing encroachment fills me with anger and helplessness, especially since I am unable to access my land or defend my rights.

A similar sense of hopelessness now permeates the Gaza Strip, whether Palestinians there witnessed their home being demolished or are now returning to a pile of rubble in its place.

ii. The Gaza Strip

As explained above,¹⁵⁴ witnessing home demolitions has serious and lasting consequences on the mental health of Palestinians. Studies have revealed high levels of stress, anxiety, depression, paranoia, phobias, and a general lack of hope in Palestinian families who have experienced home demolition as well as those who are subject to a constant threat of demolition.¹⁵⁵

¹⁵³ Al-Haq Affidavit 2025-04-149-JE-D-T1-IL-DIS, taken from I.H.I.AK., resident of Jaba'

¹⁵⁴ See Section III(a)

¹⁵⁵ M Marie & S SaadAdeen, 'Mental health consequences of home demolition policy towered Palestinians: Literature review' (2021) 15 International Journal of Mental Health Systems

<<https://pmc.ncbi.nlm.nih.gov/articles/PMC8164308/>> accessed 15 September 2025; S Qouta, R-L Punamaki &

By 17 September 2025, 82 percent of the Gaza Strip was designated as an Israeli-militarised zone, under displacement orders, or both.¹⁵⁶ Israel has damaged or destroyed 92 percent of housing units, leaving 1.4 million Palestinians in need of emergency shelter and essential household items.¹⁵⁷ The systematic destruction of Palestinian residences combined with the mass forcible transfer of Gaza's entire population to shrinking slivers of land, devoid of all essentials for survival and with the knowledge that they have no home to return to, if even allowed return to the ruins and rebuild, has inflicted severe psychological harm on Palestinians throughout the Gaza Strip, as previously outlined.¹⁵⁸

b. Human Shields

Our organisations have documented a pattern of incidents where Israeli soldiers have deliberately coerced Palestinian civilians, including children, into being human shields to walk in front of them, and search various places, including houses and tunnels, so that hostile fire is directed at them and not at the Israeli Occupying Forces (IOF). This pattern represents an Israeli practice known as the 'Johnnie procedure' or 'neighbour procedure', where Palestinian children are used by the Israeli military to knock on the doors of Palestinian houses and apartments while the IOF search them. The patterns further involve arbitrary detention, beatings to obtain information on members of the Palestinian resistance and the use of intimidating methods, including the use of police dogs.

Testimonies given by former Israeli military officers revealed that the practice "became widespread by the middle of 2024", to the point that "every infantry unit used a Palestinian to clear houses before entering".¹⁵⁹

It is important to note Israel's long-standing culture of impunity for criminal conduct against Palestinians, including their use as human shields. For instance, no Israeli soldier or commander was prosecuted after the so-called Israeli Operation Cast Lead for the practice of human shielding despite a UN Commission of Inquiry report on the practice,¹⁶⁰ nor after Operation Protective Edge in Gaza,¹⁶¹ This culture of impunity has continued to prevail. The Israeli military systematically denied allegations, pointing "to a lack of details," or, when faced with

E El Sarraj, 'House Demolition and Mental Health: Victims and Witnesses' (1997) 6 *Journal of Social Distress and Homelessness* 203

¹⁵⁶ UN OCHA, 'Reported impact snapshot | Gaza Strip (17 September 2025)' (17 September 2025) <<https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-17-september-2025>>

¹⁵⁷ UN OCHA, 'Reported impact snapshot | Gaza Strip (17 September 2025)' (17 September 2025) <<https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-17-september-2025>>

¹⁵⁸ See Section II (b)(i)

¹⁵⁹ Sam Mednick and Samy Magdy, 'Israeli use of human shields in Gaza was systematic, soldiers and former detainees tell the AP', Associated Press (24 May 2025) <<https://apnews.com/article/israel-palestinians-hamas-war-army-human-shields-80f358dd2c87a1123f26ffada159701c>>

¹⁶⁰ United Nations General Assembly, "Report of the United Nations Fact-Finding Mission of the Gaza Conflict", 25 September 2009, A/HRC/12/48, para. 55, 1032-1106

¹⁶¹ B'Tselem, 'Human Shields' (11 November 2017) <https://www.btselem.org/human_shields>

undeniable proof, announced a probe, without providing further details. Over the years, such lack of accountability and genuine inquiry has cast significant doubts over “Israel’s ability to investigate itself”, warranting the investigation by the International Criminal Court to proceed.¹⁶²

On 6 May 2024, at approximately 8:00 am, 20-25 Israeli soldiers, with black masks on their faces, raided a building in the Tulkarem refugee camp. As part of the attack on the camp started the day before, the IOF used a Palestinian child, K.A., 11, as a human shield. K.A. recalled to Al-Haq:

The soldiers began searching the apartment, and during that, one of them asked me in understandable Arabic if there were any men in the house. I told him, “No.” Then the soldier forced me, accompanied by other soldiers, to walk in front of them inside the apartment and open the closed doors. Inside it were several doors to a room inside the apartment, as I would open the door to the room and then the soldiers would enter it while pointing their weapons forward, and this was repeated in several rooms, as I walked in front of them and they behind me . . .

I cannot describe my feelings and the intensity of fear that I felt while the soldiers were taking me from inside the apartment on the fourth floor to the top of the stairs. Then they forced me to walk down the stairs to the main entrance of the building and to the first floor of the building. I was walking among about 20 soldiers, all of them armed. [...] one of them told me that they were going to send me outside the building and to some of the houses next to the building in order to open the doors of those houses and ask their residents to leave. That is, they wanted to use me as a human shield to walk in front of them and knock on the doors and ask the residents of the houses to leave . . .

K.A. recounts how the IOF beat him with wooden sticks as he was used as a human shield, insinuating that he was a member of an armed Palestinian group, while placing police dogs in close proximity to him:

[s]ome of the soldiers began to assault me severely, as some of the soldiers were carrying black wooden sticks known to us as “Qanwa”. There were three of them who assaulted me with those sticks on different parts of my body, especially my lower limbs, and in a strong way, which caused me severe pain. I was crying from the intensity of the pain and fear, as my grandmother continued to scream at the soldiers and tried to free two police dogs with the Israeli soldiers . . . all the time those dogs were close to my body.¹⁶³

¹⁶² Lorraine Malinder, ‘How common is Israel’s use of human shields in Gaza and the West Bank’ (27 May 2025) <<https://www.aljazeera.com/news/2025/5/27/how-has-israel-responded-to-claims-that-it-used-human-shields-in-gaza>>

¹⁶³ Al-Haq Affidavit 2024-05-026-TK-F-A1-IL-CLD, taken from K.H.A A.O, resident of Tulkarm

On the same day, at the same time, and as part of the same raid on the Tulkarm refugee camp, the IOF used Palestinian child M.M., 13, in the same manner as a human shield, and subjected him to beatings, placing him in close proximity to military trained dogs, while a soldier fired bullets from a gun placed over his right shoulder:

[T]he soldiers asked me to knock on the door of the apartment on the second floor. [...] blew up the door of the apartment and then forced me to enter it and search if anyone was inside, which I did, as the soldiers were standing behind me. Then the soldiers entered the said apartment and searched it, during which time I was detained by one of the soldiers in front of the entrance to that apartment, where the soldier who was detaining me beat me with a stick in his possession. That stick is medium-length and is known to us as “the qanwa.”

I received several blows from him on my lower limbs and back, then he directed several blows with his hands to my head and face. He was asking me in understandable Arabic about the whereabouts of the Kutba members, meaning the Palestinian gunmen belonging to what is known as the Tulkarm Camp Battalion, and whenever I told him that I did not know, he struck me sometimes with the stick and sometimes with his hands, amidst my crying, fear, and pain ...

One of the police dogs accompanying the soldiers was always close to my body, but the soldiers were placing an iron cage over the mouth of that dog. However, seeing that dog caused me more fear

.... before they entered it, and while I was standing at the entrance to that apartment and shouting whether anyone was in the apartment or not, one of the soldiers fired several bullets while standing behind me with the barrel of his weapon above my right shoulder. When the soldier fired at least two bullets in that manner, I felt fear and terror, especially since the shooting came from above my right shoulder and near my right ear.

The soldiers forced me to enter the apartment on the fourth floor, where the rest of the building’s residents were detained, and we remained detained until the Israeli force withdrew from inside the building, which was around seven o’clock in the evening of the same day. As a result of what happened to me, I live in a state of shock and fear.¹⁶⁴

On 29 August 2024, at approximately 3:00 am, Israeli soldiers forced Palestinian child M.S., 9, from his home in the Nur Shams refugee camp near Tulkarm city, using her as a human shield. M.S. recalled how Israeli soldiers forced her to open the door of a building and enter it, while using military dogs:

¹⁶⁴ Al-Haq Affidavit 2024-05-026-TK-F-A2-IL-CLD, taken from M.M., resident of Tulkarm

“[The IOF] got everyone out of the house except me. They kept me with them and told me to go and open the door in Arabic. They were behind me, ready to shoot. I actually went towards the door and tried to open the door, but I couldn’t. I told them that I couldn’t open the door. However, one of the soldiers repeated his request for me to open the door and said to me, “Go back and open the door.” Here I went back and tried to open the door again in front of a number of Israeli soldiers who were behind me, only a few meters away from me. I was kicking the door with my feet and hands with all my strength out of fear until it opened and I was able to do so. They then ordered me to enter and they brought a dog behind me who was with the soldiers after removing the muzzle from its mouth. I saw that and the soldiers were calling the dog by the name ‘Lucy’. I went into that room and the dog entered from behind me and started smelling everything inside the room. Then it started smelling me by getting close to my body. At that time, I felt very afraid”¹⁶⁵

In addition, I.A., 15, described how he was used as a human shield in a similar manner in the Tulkram refugee camp, on 6 May 2024, around 9:00 am:

During that field investigation, I was beaten by some of the soldiers who hit me with their hands all over my body. Then one of the soldiers tied my hands with plastic ties and asked me to go outside with several soldiers in order to evacuate the residents of some of the houses near where I live in the al-Sawalmeh neighbourhood. In other words they used me as a human shield to walk in front of the soldiers in the alleys of the AlSwalmeh neighbourhood, to enter the houses that the soldiers chose and to ask the residents of those houses to leave them so that the soldiers could enter them . . .

. . . I was walking in front of them . . . and the soldiers asked me to knock on the doors of several houses around my house and ask their residents to leave them. I saw the soldiers working to transfer the residents of those houses to other houses, then the soldiers asked me to enter those houses and open all the closed doors in them and then leave. After that the soldiers raided those houses and searched them, and this was repeated in three houses . . . The Israeli soldiers used me as a human shield.

Palestinian children who have been subject to inhuman and degrading treatment are further suffering from trauma. In Gaza, Mohammad Shbeir, aged 17, who was taken captive and used as a human shield by Israeli soldiers recounted: “I was handcuffed and wearing nothing but my boxers”.¹⁶⁶ Forced to walk ahead of the IOF in the Gaza Strip, in December 2023, Ahmed, 16, recalled: “We were so scared that we might be killed at any second. They were beating us with their weapons telling us to keep moving”. Ahmed and his cousin, Shadi, 11, were used as human shields for half a day. Shadi’s father observed that his son was struggling with post-traumatic

¹⁶⁵ Al-Haq, Affidavit 2024-09-034-TK-F-T1-IL-CLD

¹⁶⁶ CNN, ‘The Israeli military has used Palestinians as human shields in Gaza, soldier and former detainees say’ (24 October 2024) <<https://edition.cnn.com/2024/10/24/middleeast/palestinians-human-shields-israel-military-gaza-intl>>

stress disorder (PTSD), described by Shadi in the following terms: “I was going to the bathroom all the time, I was so scared to go on my own. I dream that soldiers are coming to take me and hit me”.¹⁶⁷

M.A., 44, further described how he was forced into being a human shield by the IOF:

I was forced. I told him... I mean, at one point I just couldn't go on – I collapsed. They sprayed me with water, and I still couldn't move. They woke me up and said, “Get up, finish your job.” I told him, “I can't, I'm exhausted.” It was around 8:00 pm. I told him, “I'm too tired.” He said, “Get up, you son of a bitch,” and pointed an M16 rifle at my head.

... Exactly – they'd execute you instantly. It wasn't a choice at all. I mean, excuse my language, how long can this go on? A weapon to your head, and they tell you to strip – you have to strip. They say enter that house – you have to enter. It's not your decision. There's a drone over your head, snipers, and a phone filming you. I was living in a constant state of terror. I've never seen anything like this in my entire life. Why us? Why are we the ones this is happening to, while the rest of the world lives in peace? Are we dogs to the extent that we have no value? Enough already. We are exhausted. I swear to God, we're exhausted.

M.A. also corroborated the practice of using dogs against Palestinians and stated that he was severely affected by his human shield experience:

Yes, and one of their dogs bit a young man who was also being used as a human shield – bit his hand and his leg.

I'm not okay. I don't sleep at night. I swear to God I don't sleep before 7:00 or 8:00 in the morning – and when I do sleep, it's nightmares and fear. I wake up curled up like this. I have a diagnosed psychological condition now – officially. I have severe anxiety. I can't even tolerate speaking to anyone. I talk and I feel like crying. I just can't. I swear to Almighty God.¹⁶⁸

M.S., 37, and his brother were further used as a human shield to search and film a number of rooms in a terrifying and coercive environment he described at length:

They split us into groups with the soldiers. They brought us into houses in the neighbourhood to blow up the walls, gave us cameras and said, “Go in and search the whole house,” claiming there were explosives inside.

...I would film for them and then bring it back. They'd watch the video to check if it was safe and then move in. But they'd raid houses without finding any weapons —

¹⁶⁷ Independent, ‘Stripped and held at gunpoint, the Gaza schoolboys ‘forced to be Israel’s human shields’ (31 August 2024) <<https://www.independent.co.uk/news/world/middle-east/israel-human-shields-gaza-war-b2604589.html>>

¹⁶⁸ Al-Haq Affidavit GZ133, taken from M.A., resident of Khan Yunis, Gaza

there was nothing. And we're the ones who paid the price for that. It was pure terror. The smell of corpses was everywhere. We came across dead bodies right at the entrance of Nasser — three bodies dumped in the street. It was an absolutely horrifying sight. Those two weeks were some of the worst days of my life, especially at Nasser Complex. The area was packed, but not a soul was around. I was alone at 11:00 pm — no electricity, nothing, just using the flash on my phone.

...I spent about 3 hours. It's a large and frightening hospital. Two floors — I covered two, and my brother covered the other two.... Their snipers were everywhere. Their drones were everywhere. Any wrong move — like standing by the window or looking outside — was forbidden. They had warned me clearly: any wrong move, if you stand by a window or anything like that, you're responsible for yourself.

... their bullying was beyond anything — obscene insults, the filthiest words. And my brother was emotionally crushed — he couldn't do anything. In the end, all you want is to return safely to your children, thank God.

...In a single moment, your life becomes a story. On the fifth day, when we were finally leaving the area — they had told us once we were done, "don't you dare go anywhere." Then later they said, "You're done with us now, you'll go." So we finished with them at 12:00 am. They put us on the stairs, and created this terrifying atmosphere like they were going to execute us right then. They sat me in the corner on the landing, put a pillow over me, and turned on the laser — like that was it, I was done for.

They wanted to evacuate the area. At that point, they'd pushed me into a psychological state where I would go with them just so they wouldn't execute me. I understood — their goal wasn't really to kill me, but just to break me so I'd go with them to Hayy Al-Amal. And I'd say, "Alright, I'll go with you to death again." You understand? I lived through half an hour — the hardest in all my 30 years of life. Probably the most difficult 30 minutes I've ever lived. I sat there, eyes closed, with the laser pointed at me — one minute on my heart, one on my head, another on my chest. Imagine five laser dots on you, and total darkness. I thought it was over — I recited the shahada and left it to God.¹⁶⁹

Furthermore, I.B. recounted the horrific conditions in which him and other persons were forced to walk in front of Israeli soldiers:

In Al-Shuja'iyya, when they made me walk for two hours at night, they used me as a human shield. I was in front and they were behind me—so if anything happened, I'd be the one hit. I was with a group of young men. We were all used as human shields. The boys were blindfolded and handcuffed—I was the only one who could see. I kept tripping and falling. The ground was mud and rubble, tanks and

¹⁶⁹ Al-Haq Affidavit GZ125, taken from M.S., resident of Khan Yunis, Gaza

*bulldozers. The boots I was wearing tore apart, and I ended up barefoot. It was a mess. Imagine walking toward your own death, knowing it could happen any second. I wished for a sudden death—that a missile would strike me out of nowhere—rather than being taken somewhere and killed deliberately. Just thinking about dying like that was unbearable.*¹⁷⁰

The different Israeli practices consisting of the use of Palestinians as human shields, as described above, generally involve not only physical but also mental pain. The fact of the attacks taking place in the context of a decades-long settler colonial apartheid regime, unlawful belligerent occupation and genocide in the Gaza Strip, exposes Palestinians to “continuous cycles of violence and trauma, profoundly affecting their mental health” resulting in psychological impacts with long-term consequences exacerbated even further by their use as human shields.¹⁷¹

We must stress the particular level of fear inflicted on children. Shadi still has PTSD and nightmares recurring from the abduction and beating he was subjected to. The child M.M., recalled how he was particularly affected by the shot fired by the Israeli soldier just above his shoulder. In addition, the use of aggressive police dogs, sometimes without their muzzle, searching in close proximity to the children, also played a crucial role in terrorising them.

Considering the circumstances, the age of the children, their inability and that of their parents, to defend themselves against Israeli soldiers armed with military weapons and dogs—as well as the context of Israel’s settler colonial apartheid regime, belligerent occupation and genocide — it is beyond dispute that the fear we are discussing does not constitute mere pain but meets the threshold of severe pain or suffering as required by Article 1 of the Convention against Torture. The intent of Israeli soldiers to torture Palestinians can be inferred from the context, Israeli soldiers raiding Palestinian homes, which is a common practice, and using the children for specific purposes. It is plain that the soldiers meant to cause fear among the children, so they could deploy them as human shields. It is also plain that they intended to hit the Palestinian children for the same purpose.

- i. Characterising the entire civilian population as human shields, an act aimed to spread terror

Shortly after 7 October 2023, Israel’s Prime Minister Benjamin Netanyahu warned that Israel “seeks to minimize civilian casualties,” while “ Hamas seeks to maximize civilian casualties”, perpetrating:

[A] double war crime: targeting our civilians while hiding behind their civilians, embedding themselves in the civilian population, and using them as human shields. We’ve seen the cost of this — this terrible double war crime against humanity . . . As

¹⁷⁰ Al-Haq Affidavit GZ205.1, taken from I.B., resident of Al-Zaytun, Gaza

¹⁷¹ WHO, ‘Cases of trauma due to war and violence among children in Gaza’ Vol 31 (2025)

<https://www.emro.who.int/emhj-volume-31-2025/volume-31-issue-4/cases-of-trauma-due-to-war-and-violence-among-children-in-gaza.html>

Israel legitimately targets terrorists, civilians are unfortunately harmed. Hamas is responsible and should be held accountable for all civilian casualties.¹⁷²

Subsequently, in November 2023, Israel's Minister of Foreign Affairs stated:

Suggesting a moral equivalence between Israel and [...] organizations is repugnant. Any sound analysis of Israeli operations cannot avoid the crucial context of the ongoing attacks, as well as the nature of the enemies, and the scope of the threat, that Israel faces on multiple fronts. It must reject any moral equivalence . . . between the IDF, which seeks to minimize civilian harm, and the [...] groups that deliberately target Israeli civilians while perversely viewing Palestinian civilians as expendable and using them as human shields.¹⁷³

Israel repeated Prime Minister Benjamin Netanyahu's January 10 statement, in its oral intervention in the *South Africa v Israel* case, once again blaming the unprecedented number of civilian casualties in Gaza, on Hamas stating: "The IDF is doing its utmost to minimize civilian casualties, while Hamas is doing its utmost to maximize them by using Palestinian civilians as human shields."¹⁷⁴ Israel has further employed this rhetoric, beyond the Occupied Palestinian Territory (OPT), similarly alleging that "U.N. troops [in Lebanon] provide a human shield for Hezbollah fighters".¹⁷⁵ Israel has maintained this narrative in the course of the ongoing genocide against the Palestinian people to "justify the widespread and systematic killing of Palestinian civilians" in Gaza.¹⁷⁶ More recently on 18 March 2025, Prime Minister Netanyahu stated in a thread on X:

This is why I authorized yesterday the renewal of military action against Hamas. Israel does not target Palestinian civilians. We target Hamas . . . And when [Hamas] embed themselves in civilian areas, when they use civilians as human shields, they are the ones who are responsible for all unintended casualties.

¹⁷² White House, 'Remarks by President Biden and Prime Minister Benjamin Netanyahu of Israel Before Expanded Bilateral Meeting' (18 October 2023) <<https://www.whitehouse.gov/briefing-room/speeches-remarks/2023/10/18/remarks-by-president-biden-and-prime-minister-benjamin-netanyahu-of-israel-before-expanded-bilateral-meeting-tel-aviv-israel/>>

¹⁷³ State of Israel, Ministry of Foreign Affairs, "Hamas-Israel Conflict 2023: Key Legal Aspects" (2 November 2023) <<https://www.gov.il/en/pages/hamas-israel-conflict2023-key-legal-aspects>>

¹⁷⁴ *Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (South Africa v. Israel)* Order of 26 January 2024 <<https://www.icj-cij.org/sites/default/files/case-related/192/192-20240126-ord-01-00-en.pdf>>

¹⁷⁵ Reuters, 'UN peacekeepers say Israel's destruction of their property breaches international law' (8 November 2024) <[UN peacekeepers say Israel's destruction of their property breaches international law | Reuters](https://www.reuters.com/world/middle-east/un-peacekeepers-say-israels-destruction-their-property-breaches-international-law-2024-11-08/)>

¹⁷⁶ UN Human Rights Council, 'Anatomy of a genocide: Report of the Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967, Francesca Albanese' (1 July 2024) UN Doc A/HRC/55/73, para. 59

Palestinian civilians should avoid any contact with Hamas [...], and I call on the people of Gaza, get out of harm's way. Move to safer areas. Because every civilian casualty is a tragedy and every civilian casualty is the fault of Hamas.¹⁷⁷

In October 2023, IOF spokesperson Rear Adm. Daniel Hagari claimed at a news conference that "Hamas has turned hospitals into command and control centers and hideouts for Hamas [...] and commanders".¹⁷⁸ Rear Adm. Daniel Hagari explained the Israeli army's targeting of Palestinian hospitals in Gaza, where the displaced civilian population were sheltering:

Human shields are a key pillar of Hamas's terror operations. Hamas systematically exploits hospitals as a key part of its war machine. This is the murderous organization we are dealing with. Hamas doesn't even try to hide it. They say it loud and clear.¹⁷⁹

In November 2023, the IOF published and deleted a post on social media platform X calling ambulances and hospitals "terrorist infrastructure" and "legitimate military targets."¹⁸⁰ Indeed, characterizations of the healthcare system in the Gaza Strip as "terrorist infrastructure" and employing the argument that militant groups were using hospitals and displaced people inside as "human shields" permeated Israeli society, with a group of 45 influential Jewish rabbis in Israel issuing a letter to Prime Minister Benjamin Netanyahu stating that there is no religious or moral objection to bombing Al-Shifa Hospital in Gaza.¹⁸¹ The Israeli military claimed that Hamas was using Palestinian civilians as human shields in Al-Shifa Hospital,¹⁸² Nasser Hospital, and the Indonesian Hospital.¹⁸³ In its systematic targeting of hospitals in Gaza, the UN Commission of Inquiry concluded that "Israel has implemented a concerted policy to

¹⁷⁷ Prime Minister of Israel @IsraeliPM, Tweet (7:15 pm, 18 March 2025)

<<https://x.com/IsraeliPM/status/1902076306533314722>>

¹⁷⁸ Reuters, 'Israeli military says Hamas hiding tunnels, operation centres in Gaza hospital' (27 October 2023), <<https://www.reuters.com/world/middle-east/israeli-military-says-hamas-hiding-tunnels-operations-centresgazahospital-2023-10-27/>>

¹⁷⁹ Emanuel Fabian, 'IDF releases new intel detailing Hamas use of Gaza hospitals for terror purposes, Times of Israel' (Times of Israel, 5 November 2023) <<https://www.timesofisrael.com/idf-releases-new-intel-detailing-hamas-use-of-gaza-hospitals-for-terror-purposes/>>; see also <<https://x.com/IDF/status/1759287790838108399>>

¹⁸⁰ Law for Palestine, 'Database of Israeli Incitement to Genocide: Armed Forces' (15 January 2024), No. 9, <<https://law4palestine.org/wp-content/uploads/2024/01/3-Database-of-Israeli-Incitement-to-Genocide-15th-January-2024-ARMED-FORCES.pdf>>.

¹⁸¹ @Nimrod_Flash, X (30 October 2023), <https://x.com/Nimrod_Flash/status/1719080045887521054>; Law for Palestine, 'Database of Israeli Incitement to Genocide: Public Expressions' (15 January 2024), No. 25 <<https://law4palestine.org/wp-content/uploads/2024/01/5-Database-of-Israeli-Incitement-to-Genocide-15th-January-2024-Public-Expressions.pdf>>

¹⁸² Sam Halpern, 'Hamas is firing mortars at Shifa' (The Jerusalem Post, 25 March 2024) <<https://www.jpost.com/israel-hamas-war/article-793576>>; Orly Goldschmidt (Spokesperson, Embassy of Israel), 'Israel never targets innocents intentionally' (The Guardian, 4 July 2024) <<https://www.theguardian.com/world/article/2024/jul/04/israel-never-targets-innocents-intentionally>>; See also ICRC, Customary IHL Rule 97: Human Shields <<https://ihl-databases.icrc.org/en/customary-ihl/v1/rule97>>

¹⁸³ Emanuel Fabian, IDF releases new intel detailing Hamas use of Gaza hospitals for terror purposes, Times of Israel (5 November 2023) <<https://www.timesofisrael.com/idf-releases-new-intel-detailing-hamas-use-of-gaza-hospitals-for-terror-purposes/>>

destroy the health-care system of Gaza”.¹⁸⁴ Since then, on May 13, two Palestinians were killed and 12 injured in an Israeli attack on Nasser hospital, with Director-General of the World Health Organisation, Tedros Adhanom Ghebreyesus stating “We repeat our call: attacks on hospitals must stop”¹⁸⁵ — hospitals are “stretched beyond breaking point”.¹⁸⁶

By deeming the entire Palestinian civilian population as “non-innocent” and “non-involved”, the Israeli authorities “in almost every assault help disguise the systematic targeting of civilians, *de facto* erasing Palestinian civilian-ness altogether”.¹⁸⁷ More specifically, indiscriminate and widespread shelling, and regular bombardment of cities, breaches Rule 2 of the ICRC IHL Database, prohibiting “violence aimed at spreading terror among the civilian population”.¹⁸⁸

IV. Conclusion and Recommendations

Taken together, the evidentiary record demonstrates that Israel’s policies and practices – comprising, *inter alia*: the mass forcible transfer of Palestinians in Gaza; routine targeting and violence against Palestinians, as well as their land and property, by illegal settlers and the IOF; their use as human shields by Israeli forces; and punitive home demolitions – amounts to the intentional infliction of severe physical and mental suffering on a protected civilian population, carried out in a widespread and systematic manner.

Assessed against the Convention against Torture, the Apartheid Convention, the Genocide Convention, the Fourth Geneva Convention (including the prohibitions on forcible transfer and destruction of property not justified by military necessity), and customary international humanitarian law, these practices satisfy the elements of torture and other cruel, inhuman, or degrading treatment, including the requisite specific intent evidenced by their design, repetition, official authorisation, and the foreseeability of the resulting harm. The cumulative effect of these measures, including dispossession, physical injury, lasting trauma, exposure to violence, loss of shelter and community, and sustained terror, is to render life unbearable for Palestinians across the OPT. In Gaza, Israel’s genocidal campaign is actively pursuing their physical and mental destruction as it pursues its annexationist agenda. Accordingly, this submission concludes that the policies and practices at issue constitute intended psychological and collective torture, which play an integral role in sustaining and advancing its genocidal, settler-colonial apartheid regime and unlawful occupation of Palestine.

¹⁸⁴ UNGA, *Report of the Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel*, UN Doc. A/79/232 (11 September 2024) p. 18
<<https://documents.un.org/doc/undoc/gen/n24/262/79/pdf/n2426279.pdf?>>

¹⁸⁵ Tedros Adhanom Ghebreyesus @DrTedros, Tweet (2:54 pm, 13 May 2025)
<<https://x.com/DrTedros/status/1922289438773698916>>

¹⁸⁶ Tedros Adhanom Ghebreyesus @DrTedros, Tweet (10:25 pm, 20 May 2025)
<<https://x.com/DrTedros/status/1924939651615281179>>

¹⁸⁷ UNGA, *Situation of human rights in the Palestinian territories occupied since 1967*, A/79/384 (1 October 2024), para. 72 <<https://docs.un.org/en/A/79/384>>

¹⁸⁸ Rule 2, ICRC, IHL Database <<https://ihl-databases.icrc.org/en/customary-ihl/v1/rule2>>