

To: World Bank Office of the President, Senior Management and Board of Executive Directors

Cc: UN Special Rapporteur on the Situation of Human Rights in the Palestinian Territories Occupied Since 1967; UN Working Group on Business and Human Rights

- Via Email -

16th April 2026

Dear World Bank Group President Banga, Senior Management and Board of Executive Directors,

Amidst the illegal occupation, apartheid and ongoing genocide in Palestine, we - the undersigned civil society organizations and human rights advocates - express our unequivocal denunciation of the World Bank's role in advancing an unlawful plan for 'reconstruction' in Gaza that fails to acknowledge the internationally recognized and inalienable rights of the Palestinian people to self-determination and freedom from foreign occupation, as well as to redress and reparations.

By joining the founding executive board of the Board of Peace (BoP) and taking on the role of limited Trustee for the BoP-associated Gaza Reconstruction and Development (GRAD) Financial Intermediary Fund (FIF), the World Bank is proactively enabling impunity for war crimes, crimes against humanity, and genocide as well as colonial governance structures that entrench Israel's illegal military occupation and apartheid in Palestine.

In the attached joint statement, we outline why it is incumbent upon the World Bank to urgently disassociate with the BoP and any related funding channels. In summary, the establishment of the BoP:

- Violates international humanitarian and human rights laws, as well as [provisional orders](#) and [advisory opinions](#) of the International Court of Justice (ICJ), rulings of the [International Criminal Court](#) (ICC) and [UN General Assembly Resolutions](#) spanning nearly six decades;
- Violates the World Bank's own mandate and policies, and poses legal liability risks for the World Bank management;
- Denies the Palestinian peoples' collective rights to self-determination and to lead the way forward for reconstruction, recovery and justice;
- Promotes dangerous notions that peace can be enforced through militarism and that reconstruction can move forward despite denying civil, political, economic, social and cultural rights of an entire people, and

- Enables an illegitimate, racialized and colonial governance model that serves the narrow corporate and geopolitical interests of its executive membership, while sidelining the realities of genocide-ravaged peoples and lands.

Accordingly, we call on the World Bank Group's Board of Executive Directors and management, to:

- Urgently withdraw the institution from the BoP and take immediate steps to terminate the GRAD FIF;
- Publicly recognize the illegitimacy of any imposed reconstruction framework, and that rebuilding of peoples' lives and livelihoods in Gaza cannot begin until Israeli Occupation Forces end the genocide of Palestinians and their illegal, decades-long occupation, siege, blockade and system of apartheid, in full compliance with the ICJ Provisional Measures and Advisory Opinions along with international human rights and humanitarian law;
- Publicly promote and advocate for Palestinian-led reconstruction frameworks - including the Phoenix Plan - as the legitimate basis for any future process;
- Publicly condemn the reprisals - including but not limited to US-initiated sanctions - against Palestinian human rights defenders and their allies, as per the World Bank's [commitment to zero tolerance for reprisals](#), and
- Cooperate with UN Special Procedures, as well as avoid participating in structures that undermine the UN multilateral system.

The **full text** of our collectively issued calls to the World Bank Group's management can be found at the end of the statement below.

We welcome the opportunity to discuss these matters further in an online or hybrid format.

Sincerely,

Action Aid International (Global)
 Addameer (Palestine)
 African Law Foundation (Nigeria)
 Al-Haq (Palestine)
 Alliance Sud (Switzerland)
 Al-Mezan Center for Human Rights (Palestine)
 Alternative Law Collective (Pakistan)
 Alyansa Tigil Mina (Philippines)
 Asia Development Alliance (Asia)
 Asia Indigenous Peoples Network on Extractive Industries and Energy (Asia)
 Asian Forum for Human Rights and Development | FORUM-ASIA (Asia)
 Asian Peoples' Movement on Debt and Development (Asia)
 Asociación Coordinadora de la Mujer (Bolivia)
 Association for Farmers' Rights Defense (Georgia)

Association For Promotion Sustainable Development (India)
BDS Thailand (Thailand)
Blind and Visually Impaired People of Solomon Islands (Solomon Islands)
Bretton Woods Project (Britain)
Cambodia Palestine Solidarity (Cambodia)
Canadian Association of Physicians for the Environment (Canada)
Canadian BDS Coalition and International BDS Allies (Canada/Global)
CEE Bankwatch Network (Central and Eastern Europe, Caucasus and Central Asia)
Centre for Citizens Conserving Environment & Management (Uganda)
Centre for Counter Hegemonic Studies (Australia)
Centre for Environment, Human Rights & Development Forum (Bangladesh)
Centre for Socio-Eco-Nomic Development | CSEND (Switzerland)
Centres of Distinction on Indigenous and Local Knowledge (Global)
Changemaker (Norway)
Chiang Mai for Palestine (Thailand)
Climate Action Network-Africa (Africa)
Climate Action Network - Canada (Canada)
Climate Change Network for Community-Based Initiatives (Philippines)
Climate Watch Thailand (Thailand)
Coalition des Volontaires pour la Paix et le Développement (Congo)
Commission for the Disappeared and Victims of Violence | KontraS (Indonesia)
Community Empowerment and Social Justice Network | CEMSOJ (Nepal)
Coalition des Volontaires pour la Paix et le Développement CVPD-RDC (Congo)
Counter Balance (European Union)
Crofter Foundation (Pakistan)
Debt Justice Norway (Norway)
Deep Sea Mining Campaign (Pacific)
Disability Peoples Forum Uganda (Uganda)
Doctors for Planetary Health - West Coast (Canada)
Emony Yefwe International (Kenya)
Entrelles (Morocco)
FIAN International (Global)
Freedom from Debt Coalition - Philippines (Philippines)
Free Trade Union Development Centre (Sri Lanka)
Focus on the Global South (Asia)
Gender Action (Global)
GenDev Centre for Research and Innovation (India)
Gerakan Gabungan Anti-Imperialis (Malaysia)
Gestos - Soropositividade, Comunicação e Gênero (Brazil)
Global Energy Embargo for Palestine (Palestine / Global)
Global Social Justice (Global)
Global Surgery Umbrella | GSU (Americas, Africa, and Asia)
Green Advocates International (Liberia)
HRM Bir Duino (Kyrgyzstan)
IBON International (Global South)
Ilias Center for Global Challenges (Bangladesh)

Indigenous Peoples Movement for Self-Determination and Liberation (Global)
Indigenous Women Legal Awareness Group | INWOLAG (Nepal/Asia)
Indonesian Students for Justice in Palestine (Indonesia)
Inisiasi Masyarakat Adat (Indonesia)
Institute for Economic Justice (South Africa)
Institute of the Blessed Virgin Mary - Loreto Generalate (Global)
International NGO Forum on Indonesian Development (Indonesia)
International Rivers (Global)
Jalaur River for the Peoples Movement (Philippines)
Jamaa Resource Initiatives (Kenya)
Jubilee Australia Research Centre (Asia-Pacific)
Just Peace Advocates/Mouvement Pour Une Paix Juste (Canada)
Kerio Valley Community Organization (Kenya)
KRuHA - People's Coalition for the Right to Water (Indonesia)
Ligue des Sacrifices Volontaires pour la Défense des Droits de l'Homme et de l'Environnement (Democratic Republic of Congo)
Manushya Foundation (Laos / Thailand / ASEAN)
MADANI Berkelanjutan (Indonesia)
MenaFem Movement (Morocco/SWANA)
Migrant Forum in Asia (Asia - incl. SWANA)
Monitoring Sustainability of Globalisation (Malaysia)
MY World Mexico: Hub of Action for Sustainable Development in Mexico (Mexico)
National Fisheries Solidarity Movement (Sri Lanka)
National Forum For Human Rights (Yemen)
New Trade Union Initiative (India)
NGO Forum on ADB (Asia Region)
The Oakland Institute (USA)
Oceania Pride (Fiji/Pacific)
Oil Workers' Rights Protection Organization Public Union (Azerbaijan)
Oyu Tolgoi Watch (Mongolia)
Pakistan Development Alliance (Pakistan)
Pakistan Fisherfolk Forum (Pakistan)
Palestinian Centre for Human Rights (Palestine)
Palestinian Institute for Climate Strategy (Global)
People of Chiang Mai for Palestine (Thailand)
Pesticide Action Network Asia Pacific (Asia Pacific)
Policies for Equitable Access to Health | PEAH (Italy)
Puanifesto (Indonesia)
Quest For Growth and Development Foundation (Nigeria)
Reality of Aid - Asia Pacific (Asia Pacific)
RIPESS - Intercontinental Network for the Promotions of Social Solidarity Economy (Spain)
Rivers & Rights (South East Asia Region)
Rivers without Boundaries (Mongolia)
Rural Area Development Programme (Nepal)
SAVE Rivers (Malaysia)
SEDRAc - Servicioextension Desarrollo Rural Agricultura, Genero (Chile)

Social and Economic Policies Monitor - Al Marsad (Palestine)
Society for International Development (Global)
South Africa Palestine Movement (South Africa)
Third World Network (Global)
TRIPPINZ CARE Inc. (USA)
Trend Asia (Indonesia)
Urgewald (Germany)
Uzbek Forum For Human Rights (Uzbekistan)
Vikas Adhyayan Kendra (India)
Wemos (Netherlands)
Women Development Program (Bangladesh)
World BEYOND War (Global)
World Economy, Ecology & Development - WEED e.V. (Germany)
World's Youth for Climate Justice (Global)
Worldwide Lawyers Association | WOLAS (Turkiye)
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Civil Society Demands World Bank Withdraw from the Board of Peace; Terminate Facilitation of Funding

April 2026

Summary

Amidst the ongoing genocide in the occupied Palestinian Territory, over 180 civil society groups and human rights advocates have signed this joint statement to express our unequivocal denunciation of the World Bank's role as the limited Trustee for the BoP-associated Financial Intermediary Fund (FIF) for Gaza Reconstruction and Development (GRAD) and as a member of executive board of the Board of Peace (BoP).

The statement below highlights how the establishment of the BoP and proposed role in the reconstruction of Gaza stand in clear violation of international law, entrench Israel's illegal military occupation and denial of Palestinians' inalienable right to self-determination, and provide a diplomatic cover for the commission of war crimes and crimes against humanity. The plans envisioned under the BoP facilitate an agenda of furthering the physical, cultural, social and economic uprooting, as well as attempted erasure, of approximately two million Palestinians from their ancestral lands. Through asserting a settler colonial, imperialist and neoliberal approach, these plans consider Gaza in isolation from the occupied West Bank and East Jerusalem and as a blank slate, a captive investment opportunity for architectural and landscape re-engineering. By enabling the usurpation of land and plundering of resources, the plans being proposed deny the rights of Palestinians to define the necessary steps forward for recovery and reconstruction of their own communities.

Collectively, we are calling on the World Bank management to:

- Urgently withdraw the institution from the BoP and take immediate steps to terminate the GRAD FIF;
- Publicly recognize the illegitimacy of any imposed reconstruction framework, and that rebuilding of peoples' lives and livelihoods in Gaza cannot begin until Israeli Occupation Forces end the genocide of Palestinians and their illegal, decades-long occupation, siege, blockade and system of apartheid, in full compliance with the ICJ Provisional Measures and Advisory Opinions along with international human rights and humanitarian law;
- Publicly promote and advocate for Palestinian-led reconstruction frameworks - including the Phoenix Plan – as the legitimate basis for any future process;
- Publicly condemn the reprisals - including but not limited to US-initiated sanctions - against Palestinian human rights defenders and their allies, as per the World Bank's [commitment to zero tolerance for reprisals](#), and

- Cooperate with UN Special Procedures, and avoid participating in structures that undermine the UN multilateral system.

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1. Scope of this statement

This statement focuses on the World Bank's role as a member of the [executive board](#) of the Board of Peace and as the limited Trustee of the associated [Financial Intermediary Fund Gaza Reconstruction and Development \(GRAD\)](#).

However, we are also cognizant of – and deeply alarmed by – the normalization of the relationship between the World Bank Group, as well as other public multilateral financial institutions such as the [Asian Development Bank](#) and the [Inter-American Development Bank](#) – and the Israeli government, which is proactively carrying out genocide, occupation and apartheid under the leadership of a Prime Minister facing an International Criminal Court (ICC) [arrest warrant](#) for war crimes and crimes against humanity. Additionally, in the governance structures of the [World Bank](#) and other financial institutions, Israel is primarily represented by its Finance Minister, Bezalel Smotrich, an [internationally sanctioned](#) individual who has openly called for [executing](#) Palestinian prisoners without trial and [ethnically cleansing](#) Palestinians from their land.

Not only is this normalization morally reprehensible, but it also brings with it legal liabilities in relation to complicity of commission of international crimes and violations of international human rights law that these financial institutions have a fiduciary duty to respect and fulfil.

Finally, the World Bank and other financial institutions are enabling [Israeli companies](#) associated with gross violations of international humanitarian and human rights laws to bid for contracts to plan, build and operate projects in the name of 'development' across the Global South, including water, energy, agribusiness and digital sectors.

More broadly, we affirm our collective outrage and condemnation of the brutal intensification of violence and war crimes carried out by Israeli and US forces – with the complicity of several European governments and companies – against communities across historic Palestine, Lebanon, Iran and beyond. We also recognize there are – and may be further – comparable situations where the World Bank Group may finance reconstruction plans drawn up in the US that are then violently imposed without the consent of affected local and national populations.

2. Context

Over two and a half years of relentless bombing and ground invasions by Israeli Occupation Forces across Gaza have killed more than [75,000](#) Palestinians, with thousands of others dying from preventable diseases, injuries, exposure to the elements and starvation. It is estimated that the bodies of at least 10,000 Palestinians still lie [beneath the rubble](#). As of late 2025, according to the [World Health Organization](#), over 42,000 people in Gaza are coping with life-altering injuries, including about 6,000 with amputations or severe spinal injuries. According to [the United Nations Relief and Works Agency for Palestine Refugees in the Near East \(UNRWA\)](#), Gaza now has the highest number of child amputees per capita worldwide.

Israel's attacks have obliterated urban areas, razed to the ground historical and cultural sites, such as churches, mosques and universities, and destroyed critical infrastructure, including water and sanitation facilities. Fertile lands and ecologically sensitive areas such as the [Wadi Gaza](#) are now littered with unexploded ordnance, while both urban and rural areas are contaminated with asbestos and toxic chemicals such as white phosphorus. As of October 2025, the UN [estimated](#) that "around \$70 billion would be needed to reconstruct Gaza and make it safe".

This level of human and environmental devastation is not just the result of carpet bombing techniques, but also deliberate targeting through the use of Artificial Intelligence-guided drones, [thermal and thermobaric explosives](#) that instantaneously turn flesh into ash, and missiles designed to dismember bodies.

Palestinian women in particular are living the compounded effects of genocide, siege, displacement, and the collapse of social infrastructure. In many cases, they are sustaining households and communities under conditions where food systems, health services, water access, and basic public services have been systematically destroyed. The burden of care, already unevenly distributed before the war, has intensified dramatically, as women navigate the loss of family members, displacement, trauma, and extreme material deprivation while attempting to hold together the social fabric of their communities.

As of the time of writing, the Israeli Occupation Forces (IOF) continue to attack Palestinians in Gaza on a daily basis despite the so-called ceasefire that came into effect in October 2025.

Over this time, they have murdered over [757 people](#) and violated the ceasefire agreement over [2400 times](#).

Currently, the IOF are physically present with ground troops and tanks in an area covering over 58% of Gaza, encompassing not only key residential areas but also agricultural land that was once ensuring food self-sufficiency. Fishing is severely restricted or completely blocked, as Palestinian fisherfolk cannot access the sea. Israel is also expanding its armed presence and unilaterally shifting the "[yellow line](#)" to occupy even more land. Movement of people is also severely curtailed: families struggle to reunite and the limited emergency evacuations taking place have now ended as a consequence of the war of aggression on Iran. At the time of writing, even members of the BoP-affiliated National Committee for the Administration of Gaza have been unable to get the required permits from Israel to enter Gaza.

In November 2025, the UN Security Council approved the resolution [2803](#) (UNSR 2803), endorsing US President Donald Trump's [20-point peace plan](#) and 'welcoming' the establishment of the Board of Peace (BoP). Previous attempts to end the genocidal war waged against Palestinians had been paralyzed, as the US had repeatedly vetoed all previous Security Council resolutions related to enabling a ceasefire.

Notably, [UNSCR 2803](#) references the World Bank as an actor positioned to "facilitate and provide financial resources to support the reconstruction and development of Gaza, including through the establishment of a dedicated trust fund for this purpose and to be governed by donors".

By late November 2025, the World Bank's Board of Executive Directors approved a proposal for the institution to serve as a [limited Trustee](#) for the Financial Intermediary Fund (FIF) for [Gaza Reconstruction and Development \(GRAD\)](#), to enable the BoP to accumulate and disperse yet to be mobilized funds. At the World Economic Forum (WEF) in Davos in January 2026, the Charter of the BoP was officially launched. Despite the fact that UNSCR 2803 only provided for a mandate limited to Gaza and only until the end of 2027, the Charter of the BoP unveiled at the WEF made no mention of Gaza and allows an indefinite mandate at Trump's discretion. It therefore appears to create an opening for interventions in other conflict situations across the Global South, cloaked in the language of diplomacy. As such an expansive mandate was not considered at the time of World Bank board's approval of the FIF for Gaza, this context also has major implications for those at the helm of this international financial institution.

As we expose in more detail in the following sections, the establishment of the BoP and projects initially proposed under its ambit for infrastructure development in Gaza constitute grave breaches of international law, undermine the multilateral system, lack any public channels for accountability, provide diplomatic cover for the continuation of Israel's genocide of Palestinians, embolden Israel's unlawful occupation of Palestinian territory, deny the

Palestinian people's inalienable right to self-determination, further advance Israel's and American settler colonial interests, exacerbate the marginalization and dispossession of Palestinians, particularly women, and entrench a situation where civil society and critical voices are not only excluded but also silenced through state repression.

3. Breaches of international law, lack of accountability, and impunity

The World Bank - as a [specialized agency](#) of the UN - has a duty to diligently ensure its international engagements do not undermine the rulings of the highest international judicial bodies associated with the UN, such as [ICC arrest warrants](#), [International Court of Justice \(ICJ\) Advisory Opinions](#) on Israel's unlawful continued occupation of Palestinian territory, and ICJ Provisional Measures such as those in relation to [South Africa v. Israel](#). By joining the BoP, as we outline below, the World Bank is failing to comply with such rulings and is participating in a framework that runs contrary to international law, including the inalienable right to self-determination and freedom from belligerent occupation, and explicitly undermines the UN multilateral system.

Breaches of international law

Several international jurists and human rights experts¹ have expressed deep concerns about UNSCR 2803 and the BoP, as they flout key [provisions of international law](#). Specifically, the UN Security Council resolution - disregarding decades of UN General Assembly Resolutions along with findings of the ICC and ICJ - denies the inalienable [right of Palestinians to self-determination](#), consolidates Israel's unlawful presence in the occupied Palestinian territory, enables the ongoing genocide and occupation, and tramples on the Palestinian peoples' rights to redress, compensation and reparation.

In the absence of genuine Palestinian consent - and Palestine is not a member of the Board of Peace - the establishment under US control and with Israeli complicity, of an interim administration, deployment of international forces, and the authorization of the use of force in Gaza is coercive. For the coercive use of force - as a binding enforcement measure - to be authorised by the UN Security Council, it is obliged to act under Chapter VII of the UN Charter. Resolution 2803 does not include any reference to Chapter VII.

Further, Article 24 of the UN Charter places limits on the powers of the UN Security Council, declaring that UN Members "confer on the Security Council primary responsibility for the maintenance of international peace and security", but that "In discharging these duties the Security Council shall act in accordance with the Purposes and Principles of the United Nations". The ICJ's 2024 Advisory Opinion affirmation that the duties upon states not to

¹ These include Francesca Albanese (the [UN Special Rapporteur](#) on the Situation of Human Rights in the Palestinian Territory Occupied Since 1967) as well as broad alliances of [Palestinian civil society](#), such as the Palestinian NGO Network and Palestinian Human Rights Organizations Council.

recognise, i.e. not to act to legitimise, Israeli violations of international law, is binding upon the UN (to which the World Bank is associated as a specialized agency):

'The duty of non-recognition specified above also applies to international organizations, including the United Nations, in view of the serious breaches of obligations erga omnes under international law.' (para 280)

The Court concluded that the UN is 'under an obligation not to recognize any changes in the physical character or demographic composition, institutional structure or status of the territory occupied by Israel on 5 June 1967, including East Jerusalem, except as agreed by the parties through negotiations' (para 278) and 'an obligation not to recognize as legal the situation arising from the unlawful presence of Israel in the Occupied Palestinian Territory' (para 279). World Bank complicity in the Board of Peace constitutes a flagrant violation of its legal obligations.

All international organizations are limited by *jus cogens* norms such as the prohibition of genocide and the prohibition on the use of force, along with certain fundamental universal rights such as the inalienable right to self-determination which states have an *erga omnes* obligation to uphold. In light of the above, the World Bank must recognise that Security Council Resolution 2803, including in the manner by which it purports to endorse the Board of Peace (as a complicit actor in Israel's violations), as null, void and legally ineffective.

Violation of the right to self-determination

UN experts have [condemned](#) the BoP's reconstruction model as an "antithesis of a human rights-based approach to reconstruction". The UNSCR 2803 and the BoP fail to recognize Palestinians' inalienable right to self-determination, negate their political agency, invisibilize their tireless efforts for freedom from settler colonial occupation and apartheid, and pave the way for imposing a colonial governance structure.

In particular, they envision 'reconstruction' processes devoid of national sovereignty that entrench the exclusion of Palestinians from meaningful decision-making about their own future. Control over Palestinian land, water resources, infrastructure development and planning is presumed to be relinquished, with primary decision-making power wielded by external 'caretakers'.

Additionally, the BoP charter does not include any direct reference to Gaza or Palestinians, and there are no Palestinian representatives sitting on the Board. This reinforces the BoP's assumptions that Gaza can be considered as 'terra nullus', a place devoid of people with existing rights to land and properties, ripe for pillaging and the plundering of resources rather than a crime scene where an entire population of approximately two million Palestinians has

been subjected to genocide, illegal belligerent occupation and siege, as well as settler colonial apartheid.

Bolstering impunity

The BoP bolsters and normalizes impunity, creating a diplomatic facade that provides a cover for Israel's crimes in the face of gross human rights violations, war crimes, crimes against humanity, and genocide. In this regard, it is particularly alarming that Israeli Prime Minister Netanyahu is part of the Board. This means the reconstruction of Gaza under the BoP will be shaped by someone who is under arrest warrant by the ICC for committing war crimes and crimes against humanity, and who has been at the helm of the efforts to imprison, murder, genocide and ethnically cleanse Palestinians from Gaza and beyond.

The BoP effectively calls for the Palestinians - the very population subjected to genocide - to be [contained](#) and [controlled](#), in the name of protecting the security of those responsible for genocide, war crimes and crimes against humanity.

Crucially, the BoP framework does not include any consideration on how to clear rubble and debris to allow for careful exhumation of the thousands of people estimated to be buried beneath the remains of bombed infrastructure, or careful evidence preservation for the potential prosecution of war crimes and crimes against humanity.² Denial of access to – or outright destruction and erasure of – evidence that could be used in courts to assert lines of complicity and accountability are part of a broader pattern of measures being taken to ensure impunity. This is also exemplified by the imposition of sanctions on prominent Palestinian human rights defenders who engage in submitting evidence of violations of international human rights and international humanitarian law to the ICC.

Erosion of the multilateral system

Finally, by joining the BoP, the World Bank is also sidelining [existing forms of multilateralism](#) that have been institutionalized through the UN. As outlined by US President Trump during the BoP inaugural meeting in February 2026, the Board seeks to establish “oversight” over the UN and to take on the role of resolving conflicts worldwide.

The imperial ambition underpinning the BoP is also revealed by the mandate that the BoP Charter provides for Trump to serve indefinitely as BoP chair, enabling him to decide when to

² In contrast, in Syria, the Independent International Commission of Inquiry on the Syrian Arab Republic was established in 2011 by the UN Human Rights Council with a mandate to undertake careful fact-finding investigations into violations of international human rights law and “where possible, to identify those responsible with a view of ensuring that perpetrators of violations, including those that may constitute crimes against humanity and war crimes, are held accountable.” See: <https://www.ohchr.org/en/hr-bodies/hrc/iici-syria/independent-international-commission>.

step down and who will replace him. All of the BoP decisions are subject to his approval or rejection, giving him unilateral and absolute powers, with no external oversight. Effectively, this means that under the guise of diplomacy, a small circle of men – primarily representing US and Israeli-allied [corporate interests](#) – would be self-selected arbitrators of global security. This concentration of unchecked authority is especially alarming in a context where those most affected by the violence are excluded from decision-making entirely and have no access to channels for recourse let alone mechanisms for raising collective grievances.

4. Advancing a neo-colonial and neoliberal approach instead of a community-driven response

Under the rhetoric of 'development' for reconstruction and the false promise of "bringing peace", current plans promote a neocolonial, imperialist, neoliberal and racialized agenda that treat Gaza as an investment frontier while ignoring sovereignty, reparations, and Palestinian priorities.

The community-driven responses being advanced by Palestinians in Gaza

Neither BoP members nor observer states have so far acknowledged community-driven, self-determined reconstruction plans and knowledge produced by Palestinian experts and organizations. For example, the [Phoenix Roadmap](#) is a plan developed as a partnership between the Union of Municipalities of the Gaza Strip and an interdisciplinary and intergenerational consortium of Palestinian experts, including planners, architects, urbanists, environmentalists, legal scholars, sociologists, heritage experts, economists, and medical professionals.

The Phoenix Framework [methodology](#) deliberately "enshrines dignity, participation, justice, and rootedness as foundational planning principles," [providing considerations](#) from the stages of immediate emergency planning through to long-term development and reconstruction. This plan focuses on public infrastructure – including in the transport, health, water and education sectors – reinforcing the importance of a sense of belonging and well-being within shared spaces, valuing Palestinian identities, heritage, as well as social, economic and cultural norms.

The dehumanizing rhetoric behind the reconstruction business opportunities

Given the composition of the BoP, members of the executive board appear to have their eyes set on transitioning Gaza from a '[demolition site](#)' to an [industrial hub with beach side resorts](#), where Palestinians are corralled into marginal, highly securitized border zones or forced to abandon the land with no viable livelihood options, ultimately ethnically cleansed from the area.

As reported by [CNN](#), in September 2025, Israel's Finance Minister Smotrich described Gaza as a potential real estate “bonanza”. He claimed he was talking to the US about how to divide it up, stating he had paid a lot of money for the war, so they needed to "share percentages on the land sales in Gaza", and asserted: "We have done the demolition phase, which is always the first phase of urban renewal – now we need to build."

Meanwhile, US President Trump has mused that Gaza could become a “Riviera of the Middle East” and called on Egypt and Jordan to "absorb" Palestinians displaced to make way for corporate real estate plans.

The role of the private sector

In its document "*Establishment of a Financial Intermediary Fund for Gaza Reconstruction and Development*", the World Bank suggests the current situation presents a "rare opportunity to fundamentally reshape [Gaza's] economic and social landscape" and repeatedly highlights the private sector as a supposed driver for 'development' that will enable Gaza's integration into global markets.

As reported by [Al Jazeera](#), during the BoP inaugural meeting, World Bank President Ajay Banga also affirmed: "This work is going to need two or three things that the World Bank Group can bring to the table. The first is leveraging public finance...The second is, we can de-risk private investing. And the third is we have people on the ground [with] expertise and knowledge of doing this kind of work in other markets”.

The imposition of plans intended to de-risk and attract private finance for ‘market driven’ development in Gaza fails to take into account the extensive [documentation](#) by regional and international civil society groups exposing precisely how such a framework exacerbates and reinforces existing inequalities, creates further marginalization as well as socio-economic suffering, undermines democratic decision making and public participation and has deeply gendered impacts. Furthermore, such an approach is wholly inappropriate to consider as a way forward in the context of Gaza, where people have been subjected to genocide, infanticide, domicide, uricide, scholasticide, ecocide, culturicide and epistemicide, and currently remain under illegal Israeli military occupation and unlawful siege.

As documented by the [Palestinian Information Center](#), "countries [and the major construction and infrastructure companies that they hold interests in] are racing to offer aid and oversee reconstruction projects, not solely for humanitarian purposes, but also to assert their economic and political influence and secure a share of the battered Palestinian market." In this context, the very companies that have profited through complicity in heinous war crimes and crimes against humanity associated with Israel's ongoing illegal occupation as well as apartheid and genocide against Palestinians as outlined in the 2025 report "[From economy of occupation to economy of genocide](#)", by the *UN Special Rapporteur on the Situation of*

Human Rights in the Palestinian Territory Occupied Since 1967, Francesca Albanese, such as [UG Solutions](#), Palantir, Caterpillar, HD Hyundai, Chevron and Maersk, may potentially see their profits rise through [contracts for BoP associated projects](#) in Gaza.

Further restriction of movement and militarization

To date, news leaks and announcements during the BoP inaugural meeting have revealed that initial plans include the development of "[pre-fabricated trailer-style units stacked multiple storeys high](#)" to house tens of thousands of people in Rafah, within the area currently under full Israeli military control. The siting of this residential area would corral people into an area along the border with Egypt, rather than systematically support people in reconstructing their own homes and local infrastructure. As exposed by [investigative journalists](#), these planned (or 'safe') communities are expected to be equipped with biometric surveillance and multiple checkpoints with security screening, creating what could be considered 'governance labs to test ultimate control and subjugation' for dispossessed Palestinians.

Such proposals involving highly controlled residential zones, surveillance technologies, and militarized security arrangements raise serious concerns about the further restriction of movement and participation in public life along with associated gross human rights violations.

Additionally, the plan also envisions the development of a vast [army base](#), purportedly to house incoming soldiers participating in the International Stabilization Force, covering approximately 1,400 square meters. It will include a shooting range, surrounded by barbed wire and 26 watchtowers. Further militarization of Gaza -- as well as additional attempts to surveil Palestinians and restrict their freedom of movement -- run contrary to the provisional orders of the ICJ and related UN General Assembly Resolutions, and at the very least should act as highly alarming redlines for the World Bank as well as any donors considering involvement.

By supporting the reconstruction plans determined by the BoP, the World Bank is set to become an active enabler of the corralling and containment of the Palestinian people into the margins of Gaza (where the conditions of life are deliberately dehumanizing and humiliating), the plundering of natural resources and land, and the reinforcement of illegal occupation. In doing so, the institution accordingly becomes directly implicated in enabling violations of international humanitarian law under the Geneva Conventions and international human rights.

Crucially, [feminist scholarship](#) has consistently shown that militarization and displacement intensify risks of gender-based violence, economic precarity, and social isolation for women. In addition, by legitimising current US and Israeli interests in taking control over Gaza, the World Bank will be complicit in an agenda to advance further militarization and securitization

of West Asia, an area rich in oil and gas, and also a potential business hub [central to US-backed economic connectivity plans](#) such as the [India-Middle East Corridor](#).

As outlined above, these first projects being considered for financing expose the reality that at the core, 'reconstruction' under the guidance of the BoP is one which implies militarization, surveillance, confinement, domination and control and the corralling of Palestinians, as well as an attempt of physical re-engineering, erasing centuries of Palestinian rootedness in the land. Meanwhile, community-led, reparative and rights based recovery and rebuilding options have been altogether excluded from any realm of possibility. In addition, deep structural, socio-political, economic, territorial and resource related forms of injustice and oppression are left unresolved, wholly intact and unaddressed.

Exacerbating inequalities and gendered vulnerabilities

The model of reconstruction which appears to be considered 'bankable' through the [GRAD Financial Intermediary Fund](#) risks reproducing existing inequalities and deepening gendered vulnerabilities. Large-scale, donor-driven reconstruction frameworks that prioritize infrastructure contracts, private investment, and securitized governance typically overlook the everyday economies of survival that sustain life in contexts of protracted crisis, as well as how different genders use different residential and community spaces. Palestinian women have long played central roles in community organizing, informal care networks, food provision, education, and mutual aid, making it of critical importance to integrate respect and understanding of how they culturally use different residential and community spaces into any reconstruction efforts. Ignoring these forms of social reproduction not only marginalizes women's knowledge and labor but also undermines the very foundations upon which meaningful recovery and social stability depend. For any reconstruction effort to be sustainable, Palestinian women should be recognized not simply as beneficiaries of humanitarian aid, but as political actors whose knowledge, leadership, and collective organizing are essential to any development plan.

5. Lack of compliance with the World Bank's own mandate and policies

The World Bank is also acting in blatant violation of its own mandate and policies. Examples provided are non-exhaustive but rather meant to provide an indication of the lack of compliance with a range of institutional regulatory standards.

Legal Liability - As a limited Trustee of the GRAD FIF, the World Bank is proactively positioning itself to administer a fund which will foreseeably be associated with reinforcing an illegal military occupation and the forcible dispossession of Palestinians to make way for the development of infrastructure plans on their land; an area across which over ten thousand

people are estimated to remain buried beneath the rubble and which should be understood as a crime scene.

Critically, the GRAD [does not have clear guidelines](#) to exclude financing from flowing into military hardware or support for private military/security company-administered initiatives, such as the highly publicized example of the weaponization of food aid through the [Gaza Humanitarian Fund](#) (GHF). In fact, as reported by [Reuters](#), the same security firm involved in the GHF is engaged in discussions with the BoP for future deployments. As a member of the Executive Board of the BoP directly privy to discussions about which projects will receive financing, the World Bank as an institution will bear full responsibility and complicity in facilitating the movement of funds into projects and initiatives which result in exacerbating further environmental harm, dispossession, and militarized control over Palestinian land and resources as well as gross human rights violations. Additionally, there are serious questions in relation to how and to whom project contracts will be awarded, given the lack of any integrity compliance mechanism and the composition of the BoP executive board, which includes President Trump's son-in-law and other close personal associates with ties to real estate, tech and other business sectors.

Notably, the GRAD FIF [differs](#) from the other financial intermediary funds of the World Bank for reconstruction, such as for [Haiti](#) and [Ukraine](#). In both of these cases, the World Bank senior staff had a [direct role](#) in governance and oversight of the funds (with corresponding requirements to be accountable to the Board of Directors), and representatives of the state governments of Haiti and Ukraine, respectively, had a position within the governance structures of the funds, in particular with [the role of providing strategic direction](#) to – and approval of – proposed funding packages. In addition, in these cases funds were explicitly limited for *non-military purposes* and disbursed to finance the roll out of reconstruction and recovery plans that – at least in principle – were to align with nationally determined priorities. None of these provisions are in place for the funding arrangements associated with the GRAD FIF. Although a staff person has been seconded from the World Bank to assist in the administration of the GRAD FIF, this arrangement appears to nevertheless aim to shield the Bank's management and board from direct lines of accountability.

World Bank management acting beyond mandate given by the board - The World Bank's document "[Establishment of a Financial Intermediary Fund For Gaza Reconstruction And Development](#)" references the UNSR 2803 as one of the rationales for the GRAD FIF. Additionally, when the World Bank board approved the GRAD FIF, it allowed the Bank to be a limited trustee of the BoP, with "no responsibility or accountability" rather than a key decision maker. World Bank board approval considered the possibility of the Bank joining the BoP as a non-voting observer. However, as a member of the Executive Board of the BoP, World Bank President Ajay Banga is positioned to take on a leadership role in steering the BoP, exposing the Bank to greater liability.

Taking up a seat alongside other heads of state and serving as a “transitional administration” for Palestine, also places Banga in direct violation of the World Bank’s Articles of Agreement that explicitly prohibit the Bank from engaging in political activity.

Contradiction with its Partnership Charter and Assistance Strategy for the West Bank and Gaza - By supporting the BoP, which excludes any Palestinian representatives, the World Bank violates its [Partnership Charter](#), where it commits to respect the role of countries and governments in leading national development strategies and programs.

The BoP also undermines key principles of the World Bank’s long term programming in Palestine as outlined in the document [AS 2022-25](#)³, including aligning with the Palestinian Authority’s national development plans, strengthening “pathways to a well-connected Palestine” (between the occupied West Bank and Gaza), supporting the “Palestinian public sector as the central actor” and engaging with other social actors, including NGOs and municipalities.

Environmental devastation and fiduciary risks - The scale of environmental devastation in Gaza raises additional concerns regarding the World Bank’s fiduciary responsibilities and its environmental and social safeguards. Vast quantities of rubble containing hazardous materials, including asbestos, toxic residues from munitions, and unexploded ordnance now cover large portions of the territory, both in urban and rural areas, while water, sanitation, energy, and agricultural systems have been systematically destroyed. Any reconstruction effort undertaken in such conditions requires extensive environmental remediation, public health protections, and safe debris management before development activities can responsibly proceed.

6. Repression of critical voices

As referenced above, independent Palestinian voices -- civil society organizations, human rights defenders and journalists -- are increasingly being silenced. Specifically, as Palestinian organizations seeking justice and accountability are being deliberately targeted, options for their meaningful engagement and oversight on the reconstruction activities are severely curtailed. For instance, in September 2025, the [US sanctioned](#) three Palestinian organizations – Al-Haq, Al-Mezan Center for Human Rights (Al-Mezan), and the Palestinian Centre for Human Rights (PCHR) – for having “directly engaged in efforts by the International

³ Although Palestine is not a member of the World Bank Group or the International Monetary Fund, grant based funding is provided to “projects led by the Palestinian Authority’s (PA) in water, energy, urban and local development, public financial management, social protection, education, health, solid waste management, digital development, the financial sector, and private sector development” in the occupied West Bank and Gaza. According to the most updated assistance strategy (2022-25), in the oPt, the World Bank “has the role as a development actor committed to sustained and long-term engagement that supports national systems, strengthens core state functions, and builds institutional resilience and capacity... [and] closely follows the overall FCV [Fragility, Conflict and Violence] strategy’s guiding principles of inclusion, transparency, and accountability”.

Criminal Court (ICC) to investigate, arrest, detain, or prosecute Israeli nationals, without Israel's consent".

These sanctions seek to stifle, paralyze and penalize the crucial work of these organizations, serving to isolate Palestinian human rights defenders; creating a chilling effect whereby [allied civil society groups and actors](#) fear they will be scrutinized and penalized for associating or expressing support for sanctioned entities. In addition, the sanctions have made it impossible for the organizations to retain bank accounts to pay their staff or receive funding from external sources. Meanwhile, Youtube also [terminated the accounts](#) of sanctioned organizations, leading to the erasure of hundreds of videos consisting of decades worth of painstaking evidence-based documentation of human rights violations. Ultimately, these sanctions constitute a stark example of how Palestinian civil society actors – the very people who are in a position to provide direction to – and monitor the progress of – a human rights-based reconstruction process in line with local histories, cultures, architectural designs and future aspirations – are also the ones whose perspectives are institutionally excluded and forcibly stifled by both leading actors within the BoP and the Board's plans.

By partaking in the BoP, the World Bank is in effect, accepting such forms of violent suppression of civil society voices and normalizing systematic exclusion, contrary to its own [commitments against reprisals](#) and stated positions on [engagement with civil society](#).

Reconstruction processes that exclude Palestinian civil society, including feminist organizations, not only violate principles of participation and self-determination, but also ignore decades of locally grounded expertise in community resilience and recovery under occupation. Any credible reconstruction effort must therefore be anchored in Palestinian leadership, uphold international law, and ensure that women and feminist actors are meaningfully involved in shaping priorities, policies, and governance structures.

7. Looking Ahead

We call on the World Bank Group's management to:

- Urgently withdraw from the BoP and take immediate steps to terminate the GRAD Financial Intermediary Fund.
- Publicly recognize that meaningful rebuilding of peoples' lives and livelihoods in Gaza cannot begin until Israeli Occupation Forces end the genocide of Palestinians and their illegal occupation well as the imposition of a decades-long siege, blockade and system of apartheid, in full compliance with the ICJ Provisional Measures and Advisory Opinions along with international human rights and humanitarian law as well as [UN General Assembly Resolutions](#) spanning over seven decades.

- Publicly recognize Palestinian-led reconstruction frameworks - including the Phoenix Roadmap – as the legitimate basis for any future process, and reject externally imposed models that deny Palestinian’s inalienable right to self-determination.
- Publicly condemn the reprisals against Palestinian civil society groups and human rights defenders, including but not limited to the US-initiated sanctions against Al-Haq, Al-Mezan and the Palestinian Centre for Human Rights, and respect the civil society call for an International Impartial and Independent Accountability Mechanism for Palestine.⁴
- Uphold the Bank’s obligations as a UN specialized agency by heeding the UN experts condemnation of the UN experts of the BoP, cooperating with the UN special procedures, and refusing to participate in structures that undermine the UN multilateral system.

⁴ Human Rights Council, Draft resolution A/HRC/58/L.30/Rev.1 on the human rights situation in the Occupied Palestinian Territory, including East Jerusalem, and the obligation to ensure accountability and justice (01 April 2025). Para 46: ‘Invites the General Assembly to consider establishing an ongoing international, impartial and independent mechanism to assist in the investigation and prosecution of persons responsible for the most serious crimes under international law committed by all parties in the Occupied Palestinian Territory, including East Jerusalem, and Israel since 2014’. Dania Akkad, Sean Mathews and Lubna Masarwa, US pressured Palestinian Authority to drop investigative power from UN resolution 04 April 2025: <https://www.middleeasteye.net/news/us-pressured-palestinian-authority-to-drop-investigation-mechanism-un-resolution>.