

## **Al-Haq Response to Call for input on the role of media in the context of Israel’s policies and practices toward the Palestinian people, especially after 7 October 2023**

Date: 20 April 2026

### **Introduction**

As outlined in the present call for input, the targeting of journalists and media workers “is not just an attack on individuals but on the international community’s ability to seek the truth and uphold the rule of law”.<sup>1</sup>

In situations of settler colonial apartheid regimes and armed conflict, where formal enforcement mechanisms are often weak, inaccessible, or entirely absent, journalists and media workers perform a vital function within the broader framework of accountability. As noted by Detter, they are “extremely useful as part of the machinery which ensures the implementation of the rules of war when most other means of enforcement are lacking.”<sup>2</sup> It is frequently through their reporting that violations of international law are brought to light, enabling global awareness and, in some instances, catalysing condemnation and collective response. Their work sustains the evidentiary and moral basis upon which preventative or remedial legal, political, and diplomatic action depend.<sup>3</sup>

Yet it is precisely because journalists serve these indispensable functions that they have become increasingly vulnerable in modern conflicts. Reporting in situations of armed conflict is an inherently perilous profession, but calculated risks are upended when military forces disregard the rules of war by deliberately targeting journalists.<sup>4</sup> As Detter observes, the perceived need by certain actors to “silence” unfavourable reporting has contributed to a pattern in which media workers are increasingly subject to attack.<sup>5</sup> This is despite the protection of journalists in armed conflict having been reaffirmed by the UN Security Council through two separate resolutions.<sup>6</sup> In February 2026, the Committee to Protect Journalists (CPJ) reported that in the

---

<sup>1</sup> UN OHCHR, ‘Call for input on the role of media in the context of Israel’s policies and practices toward the Palestinian people, especially after 7 October 2023’ <<https://www.ohchr.org/en/calls-for-input/2026/call-input-role-media-context-israels-policies-and-practices-toward>>

<sup>2</sup> Ingrid Detter, *The Law of War* (Cambridge University Press, 2000) 323

<sup>3</sup> Ben Saul, ‘The international protection of journalists in armed conflict and other violent situations’ (2008) 14(1), 101

<sup>4</sup> Ben Saul, ‘The international protection of journalists in armed conflict and other violent situations’ (2008) 14(1), 101

<sup>5</sup> Ingrid Detter, *The Law of War* (Cambridge University Press, 2000) 323

<sup>6</sup> UN Security Council, Resolution 1738 on Protection of Civilians in Armed Conflict (S/RES/1738), (2006) <[https://undocs.org/S/RES/1738\(2006\)](https://undocs.org/S/RES/1738(2006))> UN Security Council, Resolution 2222 on Protection of Journalists and the Issue of Impunity (S/RES/2222) (2015) <[https://undocs.org/S/RES/2222\(2015\)](https://undocs.org/S/RES/2222(2015))>

last 15 years, military officials have killed 373 journalists - more than 60 percent of which took place in the last three years. Israel was responsible for all but 21 of these deaths.<sup>7</sup>

Against this backdrop, the protection of journalists during a genocidal onslaught must be treated not only as a legal obligation but as an urgent priority. Failure to address and reverse the systematic targeting of journalists risks entrenching a dangerous new precedent: one in which silencing the press becomes an accepted tactic of warfare and a means to obscure genocide.

### 1. Al-Haq's Documentation of Israel's Targeting of Journalists and Media Workers

In a striking example of Israel's determination to target journalists in Palestine, Al-Haq recorded the testimony of S.F.M.B., a correspondent with TRT, who detailed the five Israeli attacks he has been subjected to.<sup>8</sup> The most recent attack, in August 2024, involved an Israeli aircraft targeting the journalists' tent, "specifically the tent housing a team of colleagues providing live coverage for TRT Arabic":

*My colleague [M.A-Z.] was next to me; he was hit by shrapnel in his left eye, which is still lodged there, and his condition is not good. There is another colleague, [M.K.] who was also hit by shrapnel in his right hand. We survived by a miracle. The bomb fell just one and a half metres from where I was standing, that is, by the vehicle bearing all the 'TV' and press markings – meaning the army knew these were areas with tents and fellow journalists.*

Earlier that same month, S.F.M.B. was on assignment with his colleague and cameraman H.A-B. They were travelling to Asdaa, north-west of Khan Younis, in a vehicle bearing all the press markings (in addition to him wearing a helmet and a protective vest), when they were directly fired upon:

*Whilst we were on the road in the car bearing all the markings, we were surprised by a shooting spree that lasted for fifteen (15) minutes. When I tried to assess the situation to see who was firing, It was military vehicles, and snipers positioned on buildings in Hamad City, from which they fired lethal bullets that pierced the windscreen and were aimed directly at our heads. The car was disabled, and there was gunfire everywhere inside the vehicle, which came under Israeli fire. **We miraculously survived, and this may well have been one of the most difficult situations we have ever experienced.***

On 12 April 2024, while on a mission in the area of the "New Nuseirat Camp" in the north-west of the Central Governorate, S.F.M.B. was again travelling with a cameraman and

---

<sup>7</sup> CPJ, *Record 129 press members killed in 2025; Israel responsible for 2/3 of deaths* (24 February 2026) <[https://cpj.org/wp-content/uploads/2026/02/Record-129-press-members-killed-in-2025-Israel-responsible-for-2\\_3-of-deaths-Committee-to-Protect-Journalists.pdf](https://cpj.org/wp-content/uploads/2026/02/Record-129-press-members-killed-in-2025-Israel-responsible-for-2_3-of-deaths-Committee-to-Protect-Journalists.pdf)> 7

<sup>8</sup> Al-Haq Transcript GZ193

photographer, S.S., in a clearly marked car through an area that was not designated as a military operations zone, but rather an area subject to a displacement order. When they exited the car and were about to start filming, an artillery shell was launched directly at them from an Israeli tank positioned approximately 250 metres away. The targeted attack, which TRT determined after a four-month investigation as direct and deliberate, caused S.S. to have about 80 percent of his right foot amputated, with S.F.M.B. also sustaining injuries.

The fourth attack occurred in November 2023. Again, while on assignment standing in a square of the Al-Shifa Medical Complex covering events, S.F.M.B. and his team – along with medical staff and civilians – were struck by an Israeli missile killing more than 30 Palestinians and injuring dozens. The fifth, and first, attack occurred approximately two to three weeks into Israel’s genocidal campaign in Gaza, whilst he was on assignment in the Al-Falouja area of Jabalia and caused multiple casualties in his team along with very significant damage due to the destruction of an entire residential block, resulting in 300 deaths.<sup>9</sup>

S.F.M.B. stressed Israel’s policy of targeting journalists to Al-Haq:

*[J]ournalists remain in the direct line of Israeli targeting; there are no red lines. Every day we stand here and appeal to Israel to spare journalists, yet Israel responds by targeting them. (...) Unfortunately, there is no immunity for journalists. We don’t even have a safe zone; we’re in tents on the roads with no safety whatsoever. (...) Israel has destroyed the homes of a large number of our colleagues, and the families of colleagues have been targeted and killed by Israeli aircraft.*

When asked “[w]hat has been the greatest difficulty you’ve encountered, even though you’ve survived five assassination attempts?”, S.F.M.B. answered plainly:

***We want the bare minimum of safety, and that doesn’t exist in Gaza.** This perhaps indicates that we are always feeling extremely anxious. You can think about this conflict, think about family, think about displacement, think about Israeli persecution, the risk that is present every hour, not just every day. Consequently, journalists here are in the crosshairs of deliberate, direct and daily targeting.<sup>10</sup>*

M.I.A-Z. is a photojournalist from Beit Hanoun, working for GZS – a news agency producing media content for international channels, covering the events taking place in Gaza – but forcibly displaced, alongside his family.<sup>11</sup> On 26 August 2024, M.I.A-Z. was in the press office near Nasser Hospital when there was an explosion at the door:

*The moment it happened, my eyes shut tight. I tried to open them, but I couldn’t. I put my hands over my eyes and when I lifted them, my hands were covered in blood. A piece of shrapnel had hit my eye and gone inside it. So I ran to the hospital A&E. (...) They*

---

<sup>9</sup> Al-Haq Transcript GZ193

<sup>10</sup> Al-Haq Transcript GZ193

<sup>11</sup> Al-Haq Transcript GZ192

*stitched up the wound to stop the bleeding, and they said to me: “That’s it; we can’t do anything else for you.”*

Despite needing surgery, Israel’s ongoing blockade of the Gaza Strip and weaponisation of humanitarian aid means there is no equipment or supplies available to carry out the operation – putting M.I.A-Z. at risk of losing his sight if the crossings do not open or sufficient aid doesn’t enter. Responding to a question by Al-Haq’s field researchers on the impact of the attack on his life, M.I.A-Z. stated:

*I’ve had to stop working, so there’s no hope of me getting a job. Secondly, I can’t see out of my eye; it’s all cloudy and I need operations. Thirdly, I’ve started worrying about the future—will the operation be successful or not? Will I lose my sight? Will they be able to do anything for my eye? Even now, all these things are weighing on my mind. I don’t know what to do. Honestly, you start to think about it and it wears you down, you know?<sup>12</sup>*

S.H.A-Q., a journalist, spoke to Al-Haq about the day her and her team were targeted by Israeli forces.<sup>13</sup> Tasked with covering scenes of displacement from Hamad City, S.H.A-Q. and her colleagues split into two groups. Her colleague was at the front in the first group and she was in the second group, so they could cover as much of the area as possible. The young men leading the first group, however, were soon surprised by a tank “suddenly and violently” advancing towards them:

*They were really taken aback and scattered. As they scattered, shots were fired directly at them. They scattered towards us; we were in a safe spot, but they scattered straight towards us. Ibrahim was hit by an explosive bullet in his leg. I saw it with my own eyes and he fell to the ground on his stomach, The rest of them were still running away, but Ibrahim started calling out, gesturing and pleading with me to come and get him out. I didn’t get him out, and the tank was advancing towards him. Of course, I had to go; I couldn’t just leave my mate behind. So I went to Ibrahim, grabbed him by the hand and said, ‘Focus on my shoulder; I’m going to get you out. Come with me.’ (...)*

*Ibrahim was the first to be hit (...) I put him on my shoulder, and just as he was about to jump, there was gunfire from that side. We looked up and saw a tank coming from the other side, as if it were surrounding us.*

When Ibrahim was hit with a second direct shot, he fell:

*When he fell, I leaned over, thinking I could lift him (...) I didn’t know I’d been hit in the back, but I felt something enter my body, something hot. I felt it enter my body I couldn’t think straight at the time; I blacked out. I don’t know what happened after that, but I blacked out and then came round. There were tanks, and the soldier who’d been*

---

<sup>12</sup> Al-Haq Transcript GZ192

<sup>13</sup> Al-Haq Transcript GZ165

*standing there started shouting at me (...) as I was being carried out, they started firing at me, at Ibrahim, and at any journalist who was trying to save [us] (...)*

*We kept walking until we reached the displaced people's tents (...) Even when we were in the displaced people's tents, they targeted us; when the young men came to check, and the girl with me checked where the injury was, they started shooting at us, even though we were in a 'safe' place.*

When S.H.A-Q. fainted, her colleagues tried to carry her but due to the speed of the approaching tank were struggling to get away. S.H.A-Q. recounted to Al-Haq:

*They said, 'Come on, [S.], everyone run for their lives', so I started walking and they were firing at us... directly at us. Even when we went up the mountain and set up camp as displaced people, [the tank] didn't leave us alone... it kept advancing.*

S.H.A-Q. clarified that the freelance journalists that were part of her crew were wearing press vests and press passes – “so the tank could see that because we were wearing blue vests with ‘press’ written on them in bold letters, ‘press’ written in bold letters” – further evincing the intentionality of the attack.<sup>14</sup>

S.M.S.,<sup>15</sup> a photojournalist from the Al-Karama area of Gaza, had been covering events in Rafah and the surrounding area since his forcible displacement there with his wife and children on 5 December 2023. On 12 April 2024, S.M.S. heard of an incursion into northern Nuseirat. Within two minutes of arriving, with other journalists already present, they were targeted:

*[A]s soon as we arrived, our crew—TRT Arabic—was targeted by a tank shell (...) the people and journalists who were with me carried me away from the danger zone. Then they put me in a car because there was no ambulance available—we were waiting, but there was too much bleeding.*

After being transferred from Al-Awda Hospital to Al-Aqsa Hospital, S.M.S. had his leg amputated above the knee. At the time of the interview, he was waiting to travel to Turkey for further treatment and to receive a prosthetic limb. As S.M.S. explained to Al-Haq, this serious, lifelong injury was sustained while him and his colleagues were wearing press vests and helmets:

*[E]ven the car we arrived in had markings indicating we were journalists. There were also other journalists next to us. It was clear to everyone that we were journalists. I was filming with a camera—not a phone—so it was obvious.*

---

<sup>14</sup> Al-Haq Transcript GZ165

<sup>15</sup> Al-Haq Transcript GZ015

*It was daytime, not night, and there were civilians around us as well as other journalists. So we were directly targeted. We didn't even have time to film—we had only been there for exactly two minutes before we were hit.*<sup>16</sup>

Finally, it is worth noting that Israel's blockade – including imposed telecommunications blackouts – has forced journalists to search for locations with some internet access in order to share the material they had gathered. This naturally makes journalists easier to target, as the Israeli Occupation Forces (IOF) can more easily identify areas where they will be operating in. I.F.M.A.O., a journalist with Al-Jazeera, spoke to Al-Haq about an attack on him and his colleague.<sup>17</sup> The northern end of Kif Miraj, near Qizan al-Najjar, was an area known to have some internet access, though still unstable. When I.F.M.A.O. spotted a reconnaissance aircraft present in the skies above the area, they knew to expect an airstrike which happened “every time they were present in this way”. I.F.M.A.O. subsequently recounted two instances in which the area was targeted – while he was present and wearing a press vest and helmet – in addition to the severe injuries sustained as they attempted to flee the area.<sup>18</sup>

A.A.A.S., a graphic designer before being injured in an Israeli attack, also noted the challenges posed by a lack of internet access.<sup>19</sup> When asked was he able to continue work since October 2023, A.A.A.S. responded:

*We tried to carry on a few times. The first time it didn't work out for us; there was no internet, nor was there any electricity. We tried again at Saadi Madoukh and found a place with internet and electricity, and we started working.*

After working there for three months, without warning, the building was targeted:

*The place we'd chosen for work was bombed whilst we were inside. (...) we hadn't even been inside the place for five minutes. We sat at the desk, then a missile struck. I remember it well; it destroyed the whole place.*

Four people, including his brother, were killed in the attack, and others sustained injuries – including A.A.A.S. who had shrapnel wounds throughout his body, in particular a deep wound in his shoulder. He underwent an amputation above the knee, and is unable to work due to no longer being able to move his right hand which is “completely immobile”. A.A.A.S. explained to Al-Haq that when he woke two days after the bombing:

*All I could think was that this was a dream or a nightmare that would end, but after a while, every day and the next, I'd wake up, but after a while I realised that this was reality.*

---

<sup>16</sup> Al-Haq Transcript GZ015

<sup>17</sup> Al-Haq Transcript GZ043

<sup>18</sup> Al-Haq Transcript GZ043

<sup>19</sup> Al-Haq Transcript GZ322

Like the other attacks outlined above, there was no identifiable danger in the area that was targeted:

*The place was just a normal house (...) It was just a normal residential building, surrounded by ordinary houses, with no danger in the vicinity. No politicians or anyone of that sort ever came to see us. So, generally speaking, it was a civilian area; there was no danger there.*<sup>20</sup>

## 2. Applicable International Law

### 2.1 International Human Rights Law

The right to freedom of expression is protected in Article 19 of the Universal Declaration of Human Rights 1948 (UDHR) and Article 19 of the International Covenant on Civil and Political Rights 1966 (ICCPR), as well as in regional human right treaties. As outlined by the ICCPR, States must guarantee the freedom of expression of all people, including the “freedom to seek, receive, or impart information or ideas of any kind”. Any restrictions on this fundamental freedom must be provided by law, in pursuit of a legitimate aim, and only so far as is necessary.<sup>21</sup>

As the present submission has outlined incidents involving the lethal targeting of journalists, the right to life – enshrined in Article 6 of the ICCPR – is also relevant and applicable in this context since it further protects the lives of journalists. The right to life is the most fundamental right from which no derogation is allowed – even in a situation of armed conflict. The UN Human Rights Committee has clarified that the application of lethal force must be no more than what is strictly necessary and proportionate in view of the threat posed by the attacker, and lethal force should only be used as a last resort when there is an immediate threat of death or serious injury.<sup>22</sup>

### 2.2 International Humanitarian Law

Under Article 4 of the Geneva Convention IV Relative to the Protection of Civilian Persons in Time of War 1949, ‘protected persons’ are those who:

[A]t a given moment and in any manner whatsoever, find themselves, in case of a conflict or occupation, in the hands of a Party to the conflict or Occupying Power of which they are not nationals.

---

<sup>20</sup> Al-Haq Transcript GZ322

<sup>21</sup> ICCPR, Art 19(3)

<sup>22</sup> UN Human Rights Committee, *General Comment No. 36 on Article 6 of the International Covenant on Civil and Political Rights, on the right to life*, UN Doc. CCPR/C/GC/36 (2018)

Therefore, Palestinians must be safeguarded from violence to life and person. The illegality of attacks on journalists and media workers derives from the protection granted to civilians and civilian objects under international humanitarian law, and from the fact that the media, even when used for propaganda purposes, cannot be considered as military objectives except in specific instances.

While international humanitarian law does not provide a definitive definition of ‘journalists’, a 1975 draft UN convention described the term as “any correspondent, reporter, photographer, and their technical film, radio and television assistants who are ordinarily engaged in any of these activities as their principal occupation”.<sup>23</sup>

Where a journalist is not authorised to accompany the armed forces, and is therefore not classed as a ‘war correspondent’,<sup>24</sup> there is no entitlement to be treated as a POW upon capture by armed forces.<sup>25</sup> Rather, journalists are to be treated in the same way as any other non-combatant under humanitarian law. Therefore, although no specific status exists for journalists and the equipment they use, both journalists and their equipment benefit from the general protection enjoyed by civilians and civilian objects unless they make an effective contribution to military action.<sup>26</sup> The legal protection they enjoy is further confirmed by Additional Protocol I to the Geneva Conventions of 1977. Article 79 expressly lists “[j]ournalists engaged in dangerous professional missions in areas of armed conflict ... as civilians” and states they “shall be protected as such” unless they engage in “action adversely affecting their status as civilians”. As noted by Ben Saul, incumbent UN Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism, this provision is understood as declaring the pre-existing law:

The provision creates no new status for journalists, but explicitly confirms that they are civilians; codifies the customary rule that they are immune from attack so long as they do not participate in hostilities; and does not prejudice the entitlement of authorised war correspondents to POW status.<sup>27</sup>

---

<sup>23</sup> Draft International Convention for the Protection of Journalists Engaged in Dangerous Missions in Areas of Armed Conflict 1975, Art 2(a)

<sup>24</sup> ‘War correspondents’ are individuals who follow an army without directly belonging to it and who are entitled to POW status ‘provided they can produce a certificate from the military authorities of the army they were accompanying’. See Second Hague Convention with Respect to the Laws and Customs of War on Land 1899, Art 13 and its annexed Regulations; Fourth Hague Convention 1907, Art 13; Geneva Convention 1929, Art 81; Oxford Manual 1880, Art 22; Lieber Code 1863, Art 50; and Geneva Convention III on Prisoners of War 1949, Art 4(A)(4)

<sup>25</sup> Under Art 4(A)(4) of Geneva Convention III on Prisoners of War 1949, war correspondents entitled to POW status are not, protected persons

<sup>26</sup> ICRC, ‘Protection of Journalists’ (Casebook) <<https://casebook.icrc.org/case-study/protection-journalists/>>

<sup>27</sup> Ben Saul, ‘The international protection of journalists in armed conflict and other violent situations’ (2008) 14(1), 106; see also ICRC, ‘Protocol Additional to the Geneva Conventions of 12 August 1949, and relating to the Protection of Victims of International Armed Conflicts (Protocol I), 8 June 1977.

Commentary of 1987’: Article 79 – Measures of protection for journalists’ (IHL Database) <<https://ihl-databases.icrc.org/en/ihl-treaties/api-1977/article-79/commentary/1987>> para 3258



Based on their status as civilians, the foundational principle of distinction – a cornerstone of IHL – must be stringently upheld. Attacks may only be directed against combatants and military objectives, while civilians and civilian objects must not be the object of an attack. Indiscriminate attacks are prohibited, and the principles of necessity, proportionality and subsidiarity strictly govern any action that may be carried out by a party to the hostilities. Journalists, like civilians, cannot be used as hostages or human shields, nor may they be made the object of reprisals.<sup>28</sup>

The protection journalists legally enjoy is only lost “unless and for such time as they take a direct part in hostilities”. This rule is applied expressly to journalists in Article 79(2) of Additional Protocol I, which provides that journalists forfeit their protection if they take action “adversely affecting their status as civilians” – still, protection is forfeit only for the duration of any “direct participation” in hostilities. According to the ICRC’s Commentary of Article 51(3) of Additional Protocol I, “direct participation in the hostilities” means “acts of war which by their nature or purpose are likely to cause actual harm to the personnel and equipment of the enemy armed forces.”

While Israel is not a State Party to Additional Protocol I, its provisions regarding the protection of civilians (including journalists) is reflective of customary international humanitarian law which is legally binding on all States regardless of ratification.

### 2.3 International Criminal Law

As the incidents included above demonstrate, the IOF have intentionally, and routinely, targeted media workers despite their protected status – which in the majority of instances was visible from ‘press’ markings on vests, helmets and vehicles. Furthermore, none of those targeted were posing any imminent threat to life or limb. Rather, they were carrying out a civilian profession and merely reporting on events. This was met with direct targeting with gunfire, missiles, and tank shells. Journalists and media workers were even pursued after initial strikes, further evincing the intentionality of attacks. Similar to Israel’s targeting of children in the West Bank,<sup>29</sup> the incidents reveal a pattern of extrajudicial executions. Indicators of such actions include using live ammunition without warning, firing repeatedly, targeting vital body parts, pursuing the media workers as they attempted to flee to safety. The clear intentionality of the conduct, across geographically and temporally distinct incidents, supports a determination of the commission of unlawful acts carried out as part of a State policy, instead of isolated or random acts of violence. This is further supported by documentation from the CPJ, which recorded 47 cases of journalists murdered because of their work. Israel was responsible for a

<sup>28</sup> See Additional Protocol I to the Geneva Conventions 1977, Arts 50-52

<sup>29</sup> See Al-Haq, Urgent Appeal , <[https://www.alhaq.org/cached\\_uploads/download/2026/04/24/urgent-appeal-pattern-of-child-killings-20-april-1777042862.pdf](https://www.alhaq.org/cached_uploads/download/2026/04/24/urgent-appeal-pattern-of-child-killings-20-april-1777042862.pdf)>

staggering 81 percent of cases, though the total number of targeted killings may be far higher due to obvious challenges in monitoring and documentation.<sup>30</sup>

These acts amount to the war crime of **wilful killing** under Article 8(2)(a)(i) of the Rome Statute of the International Criminal Court (ICC). The elements of this crime are satisfied across the documented cases: the victims were civilians and thus protected persons; the perpetrators, as members of the IOF operating in an occupied territory, were aware of both the armed conflict and the protected status of the victims; and the killings were carried out in circumstances that cannot be justified under any lawful use of force paradigm. Moreover, when assessed cumulatively, the documented incidents indicate that these killings form part of a widespread or systematic attack directed against a civilian population. As reported by the CPJ, Israel has committed more targeted killings of journalists than any other government’s military since CPJ began documentation in 1992 – for which there has been no accountability.<sup>31</sup> As of 8 April, an estimated 260 journalists had been killed in Gaza.<sup>32</sup> This figure, combined with the contextual elements outlined above, further supports the finding that the lethal targeting of journalists satisfies the crime against humanity of **murder** under Article 7(1)(a) of the Rome Statute.

Where journalists or media workers were not killed in the attack but suffered serious injury, it qualifies as the war crime of **wilfully causing great suffering, or serious injury to body or health** under Article 8(2)(iii) of the Rome Statute. The killing or infliction of serious injury further constitutes the crime against humanity of **persecution**. Under the Rome Statute of the ICC, persecution “means the intentional and severe deprivation of fundamental rights contrary to international law by reason of the identity of the group or collectivity”<sup>33</sup> – in this context the right to life and freedom of expression. As outlined in the ICC’s ‘Elements of Crimes’, the conduct must have been committed in connection with any other crime under the jurisdiction of the Court – which in the aforementioned cases is satisfied through the establishment of murder or wilful killing. The targeting of journalists also constitutes acts of **apartheid**,<sup>34</sup> as the attacks were committed in the context of an “institutionalized regime of systematic oppression and domination by one racial group over any other racial group”, and the IOF and Israeli authorities responsible intend to maintain the regime through their acts.

Finally, the **killing and infliction of serious bodily and mental harm** to Palestinian journalists and media workers amounts to genocidal acts under the Genocide Convention and Rome

---

<sup>30</sup> CPJ, *Record 129 press members killed in 2025; Israel responsible for 2/3 of deaths* (24 February 2026) <<https://cpj.org/wp-content/uploads/2026/02/Record-129-press-members-killed-in-2025-Israel-responsible-for-2-3-of-deaths-Committee-to-Protect-Journalists.pdf>>

<sup>31</sup> CPJ, *Record 129 press members killed in 2025; Israel responsible for 2/3 of deaths* (24 February 2026) <<https://cpj.org/wp-content/uploads/2026/02/Record-129-press-members-killed-in-2025-Israel-responsible-for-2-3-of-deaths-Committee-to-Protect-Journalists.pdf>>

<sup>32</sup> UN OCHA, ‘Reported impact snapshot | Gaza Strip (22 April 2026)’ (24 April 2026) <<https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-22-april-2026>>

<sup>33</sup> Rome Statute, Art 7(2)(g)

<sup>34</sup> Rome Statute, Art 7(1)(j); International Convention on the Suppression and Punishment of the Crime of Apartheid (1973), Art II(a)(i)

Statute.<sup>35</sup> They are committed in the context of Israel’s ongoing genocidal campaign in Gaza and destruction of the Palestinian people.

### 2.3.1 Targeting of Journalists Amounts to Acts of Genocide and Indicates Pattern of Genocidal Intent

Israeli leaders have openly called for the indiscriminate killing of journalists. In November 2023, Israeli Minister of Social Equality and the Advancement of the Status of Women, May Golan stated ““We need to eliminate and thwart all the collaborators, in silence and in active support of the Nazis in Hamas! The supporters and helpers of the Nazis should also die. This is true both for “journalists” and for all those “innocent uninvolved”.”<sup>36</sup> In May 2024, Israel’s Lieutenant Colonel Tal Bibi, a senior officer and Commander in the Nahal Brigade, posted on Facebook “All journalists in the Gaza Strip — you have 24 hours to evacuate, otherwise — we are not responsible for what happens to you . . . Electricity, water, communication — total blackout . . . Any soldier who films something goes to jail — no phones — total blackout. ‘0’ trucks for aid!!!!!!! Complete media blackout . . . All the garbage in The Hague or the UN - sit quietly . . . A strong hand — total media blackout and let's smash them. Let's restore our honor, our deterrence, our security”.<sup>37</sup>

Israel was responsible for two-thirds of all press killings in both 2024 and 2025.<sup>38</sup> Media workers in Gaza have been plunged into a state of constant exhaustion and anxiety from wearing a target on their back – which in the context of Israel’s ongoing genocide, takes them form of a press vest. UN OCHA reports that 260 journalists and media workers have been killed in Gaza since 7 October 2023.<sup>39</sup> pattern of attacks against journalists. In Gaza, “more journalists, more medical personnel, and more United Nations staff have been killed than anywhere in the world during a conflict”.<sup>40</sup>

Genocide is defined under Article II of the Convention on the Prevention and Punishment of the Crime of Genocide (emphasis added) “as any of the following acts committed with intent to destroy, in whole or in part, a national, ethnical, racial or religious group, as such: (a) Killing members of the group; (b) Causing serious bodily or mental harm to members of the group (c)

<sup>35</sup> Rome Statute, Art 6(a)-(b); Convention on the Prevention and Punishment of the Crime of Genocide (1949), Article II(a)-(b)

<sup>36</sup> May Golan, @GolanMay, Tweet (10:30 am, 9 November 2023), <https://x.com/GolanMay/status/1722547293813981248>

<sup>37</sup> Tal Bibi, Facebook (26 May 2024), <https://www.facebook.com/talbibi1/posts/pfbid023UKUtbdjFNL67aaMqvuW9vcoswGzGT2QoCubu1QNPLEFzmk6u2YJtLfsO7Jj58gl>

<sup>38</sup> CPJ, *Record 129 press members killed in 2025; Israel responsible for 2/3 of deaths* (24 February 2026) <[https://cpj.org/wp-content/uploads/2026/02/Record-129-press-members-killed-in-2025-Israel-responsible-for-2\\_3-of-deaths-Committee-to-Protect-Journalists.pdf](https://cpj.org/wp-content/uploads/2026/02/Record-129-press-members-killed-in-2025-Israel-responsible-for-2_3-of-deaths-Committee-to-Protect-Journalists.pdf)> ,

<sup>39</sup> UN OCHA, *Reported impact snapshot | Gaza Strip* (22 April 2026) at 15:00, <https://www.unocha.org/publications/report/occupied-palestinian-territory/reported-impact-snapshot-gaza-strip-22-april-2026-1500>

<sup>40</sup> UNRWA, *Statement of the Commissioner-General of UNRWA to the General Assembly* (4 March 2024), <https://www.unrwa.org/newsroom/official-statements/statement-commissioner-general-unrwa-general-assembly>.



Deliberately inflicting on the group conditions of life calculated to bring about its physical destruction in whole or in part; (d) Imposing measures intended to prevent births within the group; (e) Forcibly transferring children of the group to another group.” Genocide requires a *dolus specialis* (a special intent), not merely a *dolus directus*<sup>41</sup> – i.e., the acts enumerated in Article II must be accompanied not merely by an intent to commit them in the immediate sense (e.g., an intent to murder, for the act of killing), but must be accompanied by an intent to – through those acts – destroy a protected group in whole or in part, as such. Hence, genocidal intent is separate and distinct from the intent (*mens rea*) also attaching to each of the specific prohibited underlying acts (*actus reus*) of genocide listed in Article II(a)-(e) of the Genocide Convention, and must be established in addition to it.<sup>42</sup>

In *Croatia v Serbia* the International Court of Justice considered that “the most important [factors for considering genocidal intent] are those that concern the scale and allegedly systematic nature of the attacks, the fact that those attacks are said to have caused casualties and damage far in excess of what was justified by military necessity, the specific targeting of [members of the protected group] and the nature, extent and degree of the injuries caused to the [protected] population”.<sup>43</sup>

Israel’s attacks on journalists, health workers, humanitarians and UN personnel, “is part of a deliberate pattern”.<sup>44</sup> The pattern of attacks and killings of journalists are not only acts of killing under the Genocide Convention, taken together, they are indicative of a pattern of genocidal intent to destroy the Palestinian population in Gaza. As such, Israel’s widespread and systematic policy of attacking journalists and media workers must be considered further proof of its manifestly illegal conduct and ongoing intent to commit genocide.

Further, the attacks carried out by Israel, are driven by a determination to keep its unlawful acts hidden from the world and it is based on this same reasoning that, in defiance of the International Court of Justice’s Orders on Provisional Measures in *South Africa v. Israel*,<sup>45</sup>

---

<sup>41</sup> Prosecutor v. Bemba et al., Trial Chamber VII, Public Redacted Version of Judgment pursuant to Article 74 of the Statute, ICC-01/05-01/13-1989- Red (19 October 2016): “*Dolus directus* in the first degree requires that the witness knows that his or her acts or omissions will bring about the material elements of the offence.”

<sup>42</sup> Application of the Convention on the Prevention and Punishment of the Crime of Genocide (Bosnia and Herzegovina v. Serbia and Montenegro) (Bosnia v. Serbia), Judgment, I.C.J. Reports 2007, para. 187: “In addition to those mental elements, Article II requires a further mental element. It requires the establishment of the “intent to destroy, in whole or in part, . . . [the protected] group, as such”. It is not enough to establish, for instance in terms of paragraph (a), that deliberate unlawful killings of members of the group have occurred. The additional intent must also be established, and is defined very precisely. It is often referred to as a special or specific intent or *dolus specialis*; in the present Judgment it will usually be referred to as the “specific intent (*dolus specialis*)”.

<sup>43</sup> Application of the Convention on the Prevention and Punishment of the Crime of Genocide (‘Croatia v. Serbia’), Judgment, I.C.J. Reports 2015, p. 64, para. 139.

<sup>44</sup> Christopher Lockyear, @Chris\_lockyear, Tweet (10:53 pm, 4 April 2024), [https://twitter.com/Chris\\_lockyear/status/1775990033666781379](https://twitter.com/Chris_lockyear/status/1775990033666781379).

<sup>45</sup> Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (*South Africa v. Israel*), Order on Request for the Modification of the Order of 28 March 2024 (ICJ, 24 May 2024); See Al-Haq, Genocide Legal Series, Legal Brief I, Special Intent, [https://www.alhaq.org/cached\\_uploads/download/2026/04/24/genocide-series-legal-brief-i-special-intent-dolus-](https://www.alhaq.org/cached_uploads/download/2026/04/24/genocide-series-legal-brief-i-special-intent-dolus-)



Israel routinely denies access to investigative bodies and fact-finding missions to the Gaza Strip. The clear intent to bury its crimes, and those that would report on them, is explicitly recognised in testimony documented by Al-Haq, with S.F.M.B. explaining:

*[W]e report the situation with complete impartiality; we remain neutral and report what is happening. It is clear that Israel is disturbed by this picture and wants to stop the reporting of what is happening in this war; but we respond that we have a professional and humanitarian responsibility, and this coverage will not stop.<sup>46</sup>*

## Conclusion

What must stop is Israel’s genocide against the Palestinian people and methodical targeting of those working to ensure its crimes are brought to light. As noted by CPJ CEO Jodie Ginsberg, “attacks on the media are a leading indicator of attacks on other freedoms, and much more needs to be done to prevent these killings and punish the perpetrators. We are all at risk when journalists are killed for reporting the news.”

The scale of danger faced by journalists and media workers in Gaza underscores a broader pattern of silencing independent reporting in order to advance its destruction of the Palestinian people. Calls from international bodies and NGOs to end media blockades reflect growing recognition that impunity for crimes against journalists enables further violations and shields them from scrutiny. Ending these attacks and ensuring accountability is not only essential for protecting journalists, but for safeguarding the fundamental right to truth in the face of ongoing genocide.

---

[specialis-required-to-classify-acts-as-genocide-al-haq-1777033863.pdf](https://www.alhaq.org/cache/uploads/download/2026/04/24/genocide-series-legal-brief-ii-protected-groups-under-the-genocide-convention-al-haq-1777034781.pdf); and Al-Haq, Genocide Legal Series II, the Protected Group, <https://www.alhaq.org/cache/uploads/download/2026/04/24/genocide-series-legal-brief-ii-protected-groups-under-the-genocide-convention-al-haq-1777034781.pdf>

<sup>46</sup> Al-Haq Transcript GZ193