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**NGO Monitor Submission to the United Nations Human Rights Council Advisory Committee on the “Effects of Terrorism on the Enjoyment of all Human Rights,” the “negative impact of the non-repatriation of funds of illicit origin to the countries of origin on the enjoyment of human rights,” and the “role of technical assistance and capacity-building in fostering mutually beneficial cooperation in promoting and protecting human rights”**

### **Introduction**

NGO Monitor, a project of the Institute for NGO Research,<sup>1</sup> an organization in Special Consultative Status with UN ECOSOC since 2013, presents this submission to the United Nations Human Rights Council Advisory Committee on the “Effects of Terrorism on the Enjoyment of all Human Rights,” the “negative impact of the non-repatriation of funds of illicit origin to the countries of origin on the enjoyment of human rights,” and the “role of technical assistance and capacity-building in fostering mutually beneficial cooperation in promoting and protecting human rights.”

In 2006, the [United Nations by consensus adopted a Global Counter-Terrorism Strategy](#) in order to “enhance national, regional and international efforts to counter terrorism” and to “send a clear message that terrorism is unacceptable in all its forms.” The UN further states that “acts, methods and practices of terrorism in all its forms and manifestations are activities aimed at the destruction of human rights, fundamental freedoms and democracy, threatening territorial integrity, security of States and destabilizing legitimately constituted Governments...” Indeed, terrorism has claimed the lives of hundreds of thousands of innocent civilians over the years, including [2,977 killed in the 9/11 attacks](#) in the US, [1,700 in ISIS’ Camp Speicher massacre in Iraq](#), [1,348 people killed by Palestinian terrorists since September 2000](#), [130 in the November 2015 attacks in Paris](#), and [224 in the downed Russian Metrojet flight over Egypt](#). These heinous acts threaten international peace and security.

In addition to the military aspect of combatting terrorism, preventing terrorist organizations from obtaining funding for their violent strategies is of the utmost importance. The UN also highlights this aspect, stating that states must “refrain from organizing, instigating, facilitating, participating in, financing, encouraging or tolerating terrorist activities.”

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<sup>1</sup> Members of the Institute’s Advisory Board include Elliott Abrams, Senior Fellow for Middle Eastern Studies at the Council on Foreign Relations; former Canadian Ambassador to Israel, Amb. Vivian Bercovici; Amb. John Bolton, US National Security Advisor and former US Permanent Representative to the UN; Hon. Michael Danby, MP, senior member of the Australian Labor Party; Harvard Professor Prof. Alan Dershowitz; Canadian Senator, Hon. Linda Frum; best-selling author and commentator and British journalist and international affairs commentator, Tom Gross; Colonel Richard Kemp, former commander of British forces in Iraq and Afghanistan; Douglas Murray, Director of the Centre for Social Cohesion, best-selling author and commentator; former Member of Italian Parliament, Hon. Fiamma Nirenstein; UCLA Professor and President of the Daniel Pearl Foundation, Prof. Judea Pearl; US Jurist and former Legal Advisor to the State Department Judge Abraham Sofaer; Dr. Einat Wilf, former member of Knesset with the Israel Labor Party and advisor to Shimon Peres; Harvard Professor Prof. Ruth Wisse; R. James Woolsey, former US Director of Central Intelligence; and retired Israeli Supreme Court Justice, Justice Elyakim Rubinstein

In 2001, the [UN Security Council adopted resolution 1373](#) under Chapter VII of the UN Charter, instructing member states to adopt various counterterrorism measures. The resolution explicitly recommends that member states “prevent and suppress the financing of terrorist acts,” by criminalizing “financing of terrorism and associated money laundering,” “freezing and confiscation of terrorist assets...,” and taking measures to improve the “cross-border control of the movement of cash and other monetary instruments.” The resolution also recommends states “Criminalize the willful provision or collection, by any means, directly or indirectly, of funds by their nationals or in their territories with the intention that the funds should be used, or in the knowledge that they are to be used, in order to carry out terrorist acts.”

The [Financial Action Task Force](#) (FATF) further sets out eight recommendations which, “when combined with the FATF Forty Recommendations on money laundering, set out the basic framework to detect, prevent and suppress the financing of terrorism and terrorist acts.” These eight recommendations to countries include “criminalising the financing of terrorism and associated money laundering,” “freezing and confiscating terrorist assets,” and “reporting suspicious transactions related to terrorism.” FATF further notes that it is “[Countries should review the adequacy of laws and regulations that relate to entities that can be abused for the financing of terrorism](#).” Non-profit organisations are particularly vulnerable, and countries should ensure that they cannot be misused.”

Many countries have followed these recommendations. Canada’s “[Proceeds of Crime \(Money Laundering\) and Terrorist Financing Act](#),” for example, aims to “implement specific measures to detect and deter money laundering and the financing of terrorist activities and to facilitate the investigation and prosecution of money laundering offences and terrorist activity financing offences.” The [United Kingdom](#) similarly states that its “anti-money laundering and counter-terrorist financing regime has a clear aim: to ensure that the UK’s financial system is a hostile environment for illicit finance, whilst minimising the burden on legitimate businesses and law-abiding people.” The US “[Financial Anti-Terrorism Act of 2001](#)” likewise highlights working with financial institutions to “protect against international terrorism” and the importance of the Treasury Department’s Financial Crimes Enforcement Network coordinating with “financial intelligence units in other countries on anti-terrorism and anti-money laundering initiatives.”

Furthermore, in the US, [according to the Council on Foreign Relations](#) (CFR), more than “\$140 million in terrorists’ assets have been frozen across some 1,400 bank accounts worldwide.” CFR, quoting former National Security Council official Lee Wolosky, explains that there are “nefarious charities and there are good charities with nefarious people working for them.” In the US, “no charity can provide money to any organization that may have terrorism as part of their agenda.”

Indeed, charities, including non-governmental organizations (NGOs), play an important role in both the terror financing network on one hand, and the provision of aid on the other. The provision of international humanitarian and development aid in conflict zones is therefore a particularly relevant consideration for the UNHRC in its analysis of terrorism vis-à-vis human rights. The inherent tension between the “humanitarian imperative” of aiding those

suffering, coupled with the importance of ensuring that aid is not misappropriated by terror groups, poses a number of challenges. NGOs can play a central role in distributing aid and implementing projects on behalf of government and private donors. However, due to the fact that they are “on the ground,” they are unfortunately susceptible to instances of misappropriation of aid, cooperation with terrorists (willingly or out of a lack of oversight), and diversion of resources. These failures can have detrimental effects in achieving peace, human rights, and development oriented goals and are often concrete examples of violations of UN and domestic donor government anti-terror legislation.

In this submission, NGO Monitor highlights several concerns regarding the misappropriation of aid by terror groups in conflict zones. We hope that this information will aid the Advisory Committee in the preparation of its report.

### **The Humanitarian Imperative and Combatting Terror**

NGOs can play a crucial role in providing aid to vulnerable individuals in conflict zones, often risking their lives in order to provide food, supplies, medical aid, and other necessary items and services. While the intentions of these NGOs might be noble, they often exist within the context of complex conflict situations. Their efforts, therefore, can lead to entrenching conflict, increasing civilian harm, and other unintended consequences. Recognizing this reality, governments and NGOs alike have instituted strict anti-terrorism legislation and guidelines.

Unfortunately, some sectors of the humanitarian aid community have initiated efforts to weaken these protections.

An April 2017 position paper published by [Chatham House in London](#) is indicative of this campaign. The publication decries the ways in which banks, in order to comply with various national and international anti-terror financing laws, have avoided transferring funds and offering financial services to NGOs active in conflict areas where “Non-state Armed Groups” (read: terrorists and militias) operate.

The authors contend that these protocols hamper the ability of agencies to deliver humanitarian aid and are unnecessary, asserting that “Humanitarian NGOs [non-governmental organizations] generally accept the need for regulation and due diligence.” Moreover, the report demands that the UK “make greater efforts to include exemptions for humanitarian action in international sanctions” and suggests that the government “consider the introduction of humanitarian exemptions from counterterrorism laws.”

These positions understate recent revelations that highlight the susceptibility of humanitarian aid to infiltration and diversion by terrorist organizations. On July 26, 2016, for instance, the *Washington Post* [reported](#) that the [US Agency for International Development](#) (USAID) suspended hundreds of millions of dollars in humanitarian aid to Syria, in response to reports of fraud and aid diversion. In explaining the decision in testimony to the House Foreign Affairs Committee, USAID Inspector General Ann Calvaresi Barr stated, “Despite our goodwill, bad characters have taken advantage of the complex situation for personal gain,

ultimately denying Syrian people the food, clothing, health care and other aid they urgently need.”

In the West Bank and Gaza, a number of NGO officials have been found to have links to Palestinian terror groups (see below for select examples).

Likewise, in October 2014, the *Daily Beast* reported that many humanitarian NGOs operating in Syria and Iraq were found to have actively cooperated with, were employed by, or paid bribes to ISIS in order to continue working in territory under the Islamic State’s control. Aid was diverted away from its intended recipients in these countries for use by ISIS or sold for cash in service of ISIS.

Moreover, [numerous UN reports](#) have documented the large quantities of aid that have been hijacked by the Somali terrorist group Al-Shabaab. These claims are consistent with [revelations](#) in 2013 that international NGOs like Action Contre le Faim (ACF) negotiated with Al-Shabaab in order to operate in territory controlled by the group.

Similarly, research published by Patrice C. McMahon, (*The NGO Game: Post-Conflict Peacebuilding in the Balkans and Beyond*, Cornell University Press, 2017) details the cost resulting from the failure to apply appropriate oversight with respect to NGO funding and activities during the conflicts in Bosnia and Kosovo.

However, the Chatham House-RUSI paper appears to argue that a certain amount of aid diversion should be expected and tolerated: “It is of course virtually impossible for humanitarian NGOs to ensure that funds or resources will not end up in the hands of a designated individual or NSAG [non-state armed groups], particularly when operating in conflict zones, or in or near areas where designated NSAGs are based or operate”; “The government must also determine whether the delivery of aid is more important than the risk that some aid may be diverted.”

Setting aside that aid diversion is illegal under domestic and international laws and can disrupt the careful framework of International Humanitarian Law (IHL) in situations of armed conflict, the authors provide no proof that allowing for diversion of aid leads to better outcomes. Instead, the question must be asked as to whether allowing aid to be siphoned by terror groups actually enables the terror groups to further entrench their control, resulting in damage to the international legal order, the rule of law, and greater long-term suffering by affected civilian populations.

These positions echo a “humanitarian imperative” ideology adopted by many NGOs, which places the provision of humanitarian aid (as defined by these NGOs) above all other concerns. For instance, [UNICEF calls on humanitarian organizations](#) to “maintain their ability to obtain and sustain access to all vulnerable populations and to negotiate such access with all parties to the conflict,” implying that it is appropriate for aid organizations to engage with terror groups in order to gain access to affected populations instead of state or international organization officials.

In other words, these NGOs seek the ability to operate in a zone of impunity, beyond regulation or the law. This demand stands in stark contrast to the growing recognition and campaigning by these same NGOs that good governance principles such as transparency and accountability not only bind states, but non-state actors (such as corporations) as well.<sup>2</sup>

Outside of the terror context, too, we have seen horrific examples of what can happen when NGOs operate according to their own rules without oversight. For instance, on July 31, 2018, the UK House of Common's International Development Committee [published its investigative report](#) on sexual exploitation and abuse in the aid sector. The report was commissioned in February in response to disturbing allegations against employees of [Oxfam International](#) and "misconduct by staff involved in its humanitarian response in Haiti." Following the 2010 earthquake in Haiti, Oxfam employees, including the Country Director, were found to have procured prostitutes, some of whom were reportedly underage. It also emerged that Oxfam had known about the incidents for years and failed to report them to government authorities in Haiti or the UK.

In parallel to the Oxfam scandal, further allegations emerged about Save the Children-UK and [UN peacekeepers and civilian personnel](#), including "sex for food" schemes.

The [British report](#) is blunt, with the Committee expressing "confusion on the apparent shock" of international organizations and NGOs, considering "this is **a known problem in the international aid sector for years**" (emphasis added).

The report also details steps that should be taken to ensure that abuse is not only eradicated, but that the perpetrators are brought to justice and victims recompensed. The authors stress four necessary improvements – empowerment, reporting, screening, and most importantly, accountability.

[The Committee](#) highlights the failures of NGO self-regulation and stresses the need for a robust system of accountability and transparency. It adds that aid organizations must demonstrate increased emphasis on accountability and transparency "over reputation," requiring comprehensive strategies for both domestic and international regulation.

Like all actors in conflict zones, humanitarian NGOs, despite their claimed noble aims, are not and should not be exempt from national and international law. They must not be allowed to operate without scrutiny or regulation of their activities within recognized frameworks.

### **NGO Opposition to Anti-Terror Legislation**

As highlighted above, the UN and governments around the world have agreed upon and implemented a number of measures – including strict legislation – to combat terrorism. These efforts have determined that terror financing is a mass driver of terrorism and civilian harm

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<sup>2</sup> The only humanitarian organization to be granted special status is the International Committee for the Red Cross. This status has been conveyed via international treaty with near universal international agreement due to the ICRC's centuries-long track record and its operations according to strictly defined guidelines and laws. While the ICRC has also suffered its share of failures, no other NGO meets these standards.

and that proscribing such financing is critical in prevention and remediation. These laws and guidelines were enacted through lengthy and careful diplomatic and legislative processes within democratic frameworks. Yet, disturbingly, some NGOs have refused to cooperate with these efforts to prevent funds and materials from benefiting terror groups. Some groups are also ignoring such laws and instead, actively providing funding and material support. The case of the West Bank and Gaza is instructive to understand these detrimental impacts. Such cases are found in all conflict zones.

The Palestinian NGO Network (PNGO), the largest umbrella organization for Palestinian NGOs, has categorically refused to sign the US anti-terror clauses and has made membership in PNGO conditional on not signing. Specifically, according to a [2013 study](#) commissioned by the UN, PNGO “stated that its members would not sign funding agreements that included the ATC [Anti-Terror Certificate]: this is now a condition for membership under PNGO byelaws [sic].” It is highly likely, therefore, that when international organizations partner with local Palestinian organizations in order to implement aid programs, they are partnering with PNGO-affiliated organizations that will not adhere to anti-terror clauses.<sup>3</sup>

Furthermore, in June 2017, PNGO [condemned](#) Norway for [pulling funding](#) from a youth center named after Dalal Mughrabi, a terrorist who in 1978 murdered 37 civilians, including 12 children. PNGO referred to Mughrabi as a “Palestinian Woman **Freedom Fighter**,” stating that “PNGO believes this is another form of foreign domination and oppression calling Palestinian resistance a terrorist resistance against Israeli occupation...PNGO stands strong against conditional funding, especially when it **threatens Palestinian right to resist foreign domination**, exploitation, oppression and occupation” and that “**there is a difference between freedom fighters and terrorists**” (emphasis added).

In April 2017, PNGO [called on the international community](#) not to “use aid to undermine legitimate Palestinian resistance.” According to PNGO, “We reject all de-legitimization or criminalization of lawful Palestinian resistance, whether in form of allegations of terrorism, anti-semitism or otherwise... We call on all governments and aid providers to respect our right to lawful resistance, support Palestinian human rights defenders, and ensure equal, impartial and transparent access to funding for all.” No credible human rights group or aid NGO would support the glorification of those who engage in violence or promote antisemitism and other forms of bigotry, nor can those who engage in such activity be labeled “human rights defenders.”

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<sup>3</sup> In 2011-2016, the [German Society for International Cooperation- GIZ \(Germany\)](#) providing funding to PNGO for a project titled “[Strengthening Civil Society in the Palestinian Territories](#).” PNGO participates in “[Partnership for democratic development in Palestine](#),” a project (2016-2019) of [Norwegian People’s Aid \(NPA\)](#). The project, funded by [Norway](#) (NOK 50.8 million) is implemented along with 10 other partners including [Union of Agricultural Work Committees \(UAWC\)](#), [Palestinian Center for Democracy and Conflict Resolution \(PCDCR\)](#), and [Democracy and Workers’ Rights Center \[Association\] in Palestine \(DWRC\)](#). Several of these groups are affiliates of the PFLP. PNGO is a co-grantee of a [€446,482 European Union](#) grant (2016-2019) titled “Contributing to the respect, protection and promotion of the right to association in the Gaza Strip.”

NGOs that operate in Gaza claim that anti-terrorism legislation hinders effective aid project implementation. These groups are vocal in their support for amending existing legislation in order to allow cooperation with terrorist organizations like Hamas.

For example, [Mercy Corps CEO Neal Keny-Guyer](#) stated, “Under current US law, NGOs working in the world’s toughest places are sometimes forced to choose between saving lives and breaking the law.” Mercy Corps is not alone in its opposition to international anti-terror laws.

Action contre la Faim (ACF – Action Against Hunger) has also made problematic statements about working in complex environments. In a [2013 report detailing its operating principles](#), the group states its willingness to “persist in negotiating access with local power holders without prejudice to humanitarian principles and with minimal risk for the security of its staff.” ACF also states that when deciding whether or not to denounce human rights abuses it will weigh the “moral duty of condemning violations and consequently running the risk of being expelled from the area.”

Other NGOs believe the international community must engage with Hamas as the legitimately elected rulers representing Palestinians in Gaza, and there can be no conflict resolution without Hamas participation. Norwegian Refugee Council (NRC) shares this view. In 2006 it called on the Norwegian government to “[support Hamas as the democratic elected government](#) and not impose actions that lead to more instability.” NRC, in its June 2018 report, also declared that “[Counterterrorism measures often obstruct humanitarian organizations](#) from accessing people in need, according to a new study by the Norwegian Refugee Council (NRC). As states step up their fight against terrorism, people who need life-saving assistance are paying a high price.”

Similarly, the [World Council of Churches \(WCC\) lobbied](#) the EU not to cut off funding for the PA following the 2006 elections, and a WCC subsidiary lobbied the EU to reconsider its “no-contact” policy with Hamas. Other [organizations operating in Gaza](#) that have pushed the international community not to change its policy towards the PA despite Hamas’ electoral victory include Doctors Without Borders (MSF), Oxfam, Mediciens du Monde (MDM), and Save the Children. In its [2011-2015 action plan](#), Norwegian Church Aid (NCA) clearly states its intent to work with “the Government of Israel, the Palestinian Authority, the Hamas government and local authorities.”

These organizations, however, fail to consider how their policies and activities merely serve to entrench the Hamas regime that has no respect for human rights or civilian welfare.

### **Notable Cases of NGOs Linked to Terrorism**

In addition to NGO opposition to anti-terror legislation, which can result in groups providing funds and aid to terror groups, a number of organizations have direct links to terrorist actors. These direct links, including staff and board members being affiliated with a terrorist organization, can result in the direct transfer of government provided international aid to the

hands of terrorists. Other armed groups have exploited humanitarian aid organizations to obtain visas and other types of access to carry out attacks. Additionally, NGOs with ties to terror groups have a clear self-interest and political bias in the type of human rights and humanitarian work they might do, as they are directly affiliated with a violent party to the conflict. These affiliations are in clear violation of the humanitarian principles of neutrality and non-politicization.

For instance, a number of European countries fund a network of organizations that are directly affiliated with the [Popular Front for the Liberation of Palestine](#) (PFLP) – a terrorist organization designated as such by the [US](#), [EU](#), [Canada](#), and [Israel](#). Other organizations have a substantial presence of employees and officials linked to the PFLP.<sup>4</sup> The NGO ties to the PFLP range from establishment and operation of NGOs by the PFLP itself to NGO officials and staffers being convicted of terrorism charges. Some of these individuals have been denied entry and exit visas in many countries due to security concerns. A significant number of these NGO officials hold multiple positions in various organizations, indicating the close connections and relationships between these groups.

The following examples of Palestinian NGOs with ties to terror demonstrate this disturbing phenomenon:

#### *Qatar Charity*

One of the organizations that pledged funding for the rebuilding efforts in Gaza is the Qatar Charity, an organization that had ties to the Union of Good. The [Union of Good was banned by Israel](#) in 2008 as a result of their being part of Hamas' fundraising network. The [United States has also designated the group as a terrorist organization](#). The Qatar Charity itself was named by Osama bin-Laden as having [raised funds for terrorist attacks](#).

#### *Islamic Relief Worldwide*

Another organization with alleged ties to terrorism that is active in aid projects in Gaza is Islamic Relief Worldwide (IRW). In June 2014, IRW was banned from operating in Israel, Gaza, and the West Bank due to its reported role that the [group funnels money to Hamas](#). The United Arab Emirates (UAE) also declared [IRW to be a terrorist organization](#).

#### *World Vision*

World Vision too has been involved in this type of controversy. On June 15, 2016, Mohammad El-Halabi, the manager of operations for World Vision in Gaza, was [arrested by Israeli authorities](#). On August 4, the Shabak, the Israeli security agency, revealed El-Halabi to be a [Hamas terrorist](#). He was accused of diverting approximately 60% of the World Vision's Gaza budget to the terrorist organization for tunnels and fund other terrorist activity. The siphoned funds amount to [approximately \\$50 million](#). According to the charges, El-Halabi [created humanitarian projects](#) and fictitious agricultural associations to act as a cover for the hijacking of monies and materials for Hamas. In response, World Vision stated they

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<sup>4</sup> NGO Monitor's report "[The European-Funded NGO PFLP Network](#)" demonstrates the vast connections of a number of Palestinian NGOs to the PFLP terror group.

were “[shocked](#)” to learn of these charges and that “The funds entrusted to us are spent...in ways that do not fuel conflict but rather contribute to peace.”

#### *Médecins Sans Frontières*

On August 20, 2018, Hani Majdalawi, a nurse working for MSF, “[was shot dead...after shooting and throwing a grenade at soldiers](#).” On August 24, MSF announced it “is working to verify and understand the circumstances regarding this extremely serious incident, and is not able to comment further at this stage.”

#### *Ma'an Development Center*

Ma'an Development Center is a Palestinian NGO that operates in the West Bank and Gaza.<sup>5</sup> On June 28, 2018, *The Daily Telegraph* (Australia) ran an [exclusive article](#) on how the Australian government will audit “[taxpayer funds](#) [that] are being funneled to a Palestinian aid organisation that has employed and supported a leader of a terrorist group in Gaza.”<sup>6</sup> A Ma'an Development Center employee, Ahmed Aladini, was killed during the Gaza-border violence on May 14. Upon his death, the PFLP [labeled](#) Aladini as a “comrade” and “its esteemed martyr... who was martyred as he participated in the uprising of return.” He was also described as “a member of the leadership of the PFLP in Deir al-Balah.... He was one of the first comrades to join the activities, events and committees of the Great Return March, never disappearing from the camps of return, continuing to participate in the marches to the colonial fence and marching toward our occupied Palestine, believing firmly in the inevitability of liberation.”

Further research shows that Aladini's ties to the PFLP were clearly displayed on [his Facebook page](#), where he regularly posted PFLP propaganda and other materials that glorify violence and terrorists.

Yet despite his terror membership, APHEDA, the Australian union that had channeled the funds to Ma'an Development Center, [released a statement](#) condemning Israel and mourning Aladini. On May 15, 2018, Ma'an Development Center [posted on Facebook a memorial notice for Aladini](#), referring to him as a “colleague and martyr.” (Ma'an has since removed the post.)

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<sup>5</sup> Donors include [Norway](#), [Australia](#) (Australian Embassy, AUSAID), [Human Rights and International Humanitarian Law Secretariat](#) (joint funding from [Sweden](#), [Switzerland](#), [Denmark](#), and the [Netherlands](#)), [France](#), [United Kingdom](#), Canada Fund, [CARE International](#), [Caritas](#), and [Oxfam Novib](#) (the [Netherlands](#)). In January 2018, Ma'an Development Center was granted [€46,777](#) from [Oxfam Novib](#) for a project titled “Urgent Support to Affected Families.” In 2017-2018, Ma'an Development Center received [DKK 3,075,193](#) from [DanChurchAid](#) ([Denmark](#)). In 2015-2017, Ma'an Development Center received [NOK 3.6 million](#) from [Norway](#). Ma'an [received €167,000](#) from the [Dutch MFA](#) via [Cordaid](#) in 2014-2015 for a project on “Women in Gaza monitor their daily security.”

<sup>6</sup> The Australian Union Aid Abroad – APHEDA, which describes itself as “the global justice organisation of the Australian union movement,” received [40% of its income from government sources](#) in 2016-17 (latest available) – in particular from AusAID (Australian Agency for International Development). In turn, APHEDA provided funds to [Ma'an Development Center](#). According to [APHEDA's 2017 annual report](#), it is “implementing a significant five-year Australian government-funded program... in partnership with MA'AN Development Center” and others.



### Addameer

[Addameer](#), a leader of campaigns in support of Palestinians prisoners convicted of security offenses, has close ties to the PFLP.

Addameer is an official PFLP “[affiliate](#)” and a number of Addameer employees have confirmed or alleged ties to the terrorist group. For example, Addameer’s [chairperson and co-founder, Abdul-latif Ghaith](#), was banned by Israel from travelling internationally due to his alleged membership in the PFLP; he was also [banned](#) from entering the West Bank in 2011-2015. [Khalida Jarrar](#), Addameer’s [vice-chairperson](#), is a senior PFLP official. Jarrar was administratively detained on April 1, 2015 by Israeli security forces. On April 15, 2015 she was [indicted for various offenses](#) including active membership in a terrorist organization (the PFLP) and inciting violence through a call to kidnap Israeli soldiers to be used as “bargaining chips for the release of Palestinian prisoners.” Jarrar accepted a plea bargain and was reportedly [convicted](#) on “one count of belonging to an illegal organization and another of incitement” receiving a 15 month prison sentence with an additional 10 month suspended sentence. She was [released from prison](#) on June 3, 2016. According to Addameer, Jarrar was [re-arrested](#) in July 2017. In August 2017, Addameer [petitioned the President of France](#) for the release of its field researcher Salah Hamouri, who was arrested on August 23, 2017. Hamouri was [previously arrested in 2005](#) for “attempting to assassinate Ovadia Yosef [former Israeli Chief Rabbi] ... and for his involvement with the Popular Front for the Liberation of Palestine.”

### Terror Affiliated NGO Flotilla Members

Since 2010, NGOs have periodically and illegally attempted to break Israel’s naval blockade on Gaza – in place in order to attempt to prevent Hamas from smuggling weapons. For example, in 2010, the Islamic Turkish group [IHH](#), which has extensive ties to Hamas and [other terror organizations](#), lead a flotilla. International Solidarity Movement (ISM), a group known for its strategy of provoking violent confrontations with the Israeli military, was a co-organizer of the flotilla. A violent confrontation ensued when the IDF attempted to arrest members of the flotilla upon entering into Israeli waters. [Video evidence](#) shows that the so-called humanitarian activists brutally beat Israeli soldiers with knives and clubs. Instead of condemning this violence, however, [international and local NGOs sided](#) with the violent members of the flotilla and its terror affiliated sponsors.

More recently, in July 2018, the Freedom Flotilla, comprising three boats, [set sail](#) from Italy with the aim of “[end\[ing\] the siege](#)” of Gaza and “demand[ing] an end to our governments’ complicity with Israel’s war crimes and violation of human rights.”

The Freedom Flotilla [partnered](#) with the [Union of Agricultural Work Committees](#) (UAWC), identified by Fatah as an official [PFLP “affiliate”](#) and by [USAID](#) as the “agricultural arm” of the PFLP. According to academic scholar Glenn E. Robinson, UAWC was founded in 1986 by “[agronomists loosely affiliated with the PFLP.](#)” [According to the Israeli NGO Shurat HaDin](#), UAWC “was established by the PFLP; is controlled by senior PFLP operatives; makes its assets available to the PFLP; and acts in coordination with and to advance the interests of the PFLP (including active involvement in PFLP political activity).”

### **Conclusion**

The answer to the challenges of terrorism is not to weaken or dispense with the carefully crafted measures implemented globally to counter it, nor to allow NGOs to operate with impunity and outside the rule of law.

The international community, both via the United Nations and independently, have made combatting terrorism a top priority, and have emphasized the importance of preventing the transfer of government funds to terrorist organizations. As the above submission has detailed, NGOs play an important yet challenging role when operating in conflict zones within this anti-terror framework.

Indeed, strict regulations, legislation, and government oversight are imperative to ensure that taxpayer funds are not redistributed and/or misappropriated by terrorist groups. Furthermore, the UN must remain vigilant in selecting civil society partners to work with in conflict zones to ensure that staff and board members do not have ties to local terror networks.

With improved oversight and strict legislation, humanitarian and development aid will be able to benefit the civilian populations intended, and not the terror groups that prolong conflict.