SUBMISSION TO CONSULTATION:

TOWARDS A NEW EUROPEAN NEIGHBORHOOD POLICY

June 2015
NGO Monitor Submission to Consultation “Towards a New European Neighborhood Policy”

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NGO Monitor's mission is to provide information and analysis, promote accountability, and support discussion on the reports and activities of NGOs claiming to advance human rights and humanitarian agendas.

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NGO Monitor respectfully submits this report, prepared in response to the European Union’s call for consultation with civil society regarding review of the European Neighborhood Policy.

NGO Monitor (www.ngo-monitor.org) is a Jerusalem-based research institution that tracks the activities, campaigns, and funding of non-governmental organizations (NGOs) operating in the Arab-Israeli conflict. For more than a decade (following the NGO Forum of the 2001 UN World Conference Against Racism in Durban, South Africa), NGO Monitor has published numerous detailed and systematic research studies on the issues of NGO transparency, accountability, international law, human rights, humanitarian aid, and the laws of armed conflict.

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1http://www.ngo-monitor.org
SUMMARY AND RECOMMENDATIONS

Summary:
This submission has been prepared in response to the European Union’s call for consultation with civil society regarding review of the European Neighborhood Policy (ENP). It focuses on the EU’s human rights and conflict management policies, as well as the EU’s relations with Israeli civil society organizations and other non-governmental organizations (NGOs) that focus on the conflict.

Part 1 of this submission details how EU policy regarding Israel is repeatedly frustrated by:

1. Reliance on and support of a narrow segment of Israeli civil society, which advances a specific political agenda:
   ENP fails to subject NGO statements to careful scrutiny and independent verification, and does not consult a wider range of civil society organizations, results in a distorted understanding of Israeli society.

2. Disproportionate focus on the Arab minority, to the exclusion of other ethnic and religious groups:
   EU policy documents neglect the challenges and complexities of Israel’s broad diversity, and misrepresent the economic, social, and cultural situation in Israeli minority communities.

3. Disproportionate focus on the Arab-Israeli conflict:
   NGO submissions and statements reinforce an obsession with the conflict and its supposed implications for the region. These groups also exploit and distort international legal principles, which are then repeated uncritically by European officials, painting a false picture of Israeli obligations and responsibilities.

4. Misguided funding for political advocacy NGOs: Some European-funded NGOs promote anti-normalization, BDS (boycott, divestment and sanctions), and delegitimizing campaigns against Israel. These activities, which deny the Jewish right of self-determination, are diametrically opposed to a “two-state” framework. The problems are exacerbated by the lack of a formal conditionality policy for NGOs that are eligible for funding.

Part 2 of this submission examines the growing rate of antisemitism in Europe, and connections between this phenomenon and the Middle East conflict and European policies toward Israel. Significant factors include the EU’s lack of a clear definition of antisemitism and failure to acknowledge antisemitism’s root causes and the lack of discussion about antisemitism in ENP countries.

Part 3 discloses the organizations and projects funded through a variety of European Union frameworks.
Recommendations:

1. The ENP must address the fundamental distortion in the EU’s perception of Israel, which is almost exclusively restricted to the lens of Israel’s relations with Palestinians and with the Israeli-Arab minority. Important issues related to democracy and human rights in the complex and unique Israeli context are entirely missing from this agenda.

   NGO Monitor analysis shows that the EU privileges dialogue with a specific segment of Israeli civil society: fringe political advocacy NGOs that are hostile to mainstream, consensus approaches in Israel. The unreserved reliance on these NGOs contributes to a misconstrued picture of Israel and a dysfunctional policy-making process. The privileged partnership with these NGOs also prevents a direct and honest political dialogue with the Israeli government, and, consequently, cooperation on common challenges in the field of human rights and development.

   The EU needs to broaden the dialogue with Israeli civil society and the Israeli government, and develop a political dialogue where both Europe and Israel address common challenges. The ENP should foster mechanisms that subject NGO statements to careful scrutiny and independent verification, and consult a wider range of civil society organizations, in order to prevent a narrow group of organizations from advancing a political agenda that is detrimental to Israel and the peace process.

2. In order to make an effective contribution to peace, the ENP should (a) deny EU funding for NGOs that advance anti-normalization, BDS (boycott, divestment and sanctions), and delegitimizing campaigns against Israel; (b) adopt a radically different approach to the Middle East conflict; and (c) enact the principle of conditionality with regards to its funding of non-governmental actors.

   In the realm of funding for NGOs, the EU maintains a contradictory policy: It funds peace, development, and human rights projects and fosters venues of cooperation between Palestinians and Israelis (and Jordanians), but, simultaneously, also funds NGOs that advance anti-normalization and BDS campaigns against Israel. Not only has the EU ignored the phenomenon, but has intensified it by adopting and threatening sanctions against Israel.

   Due to extensive European funding, once-fringe NGOs that espoused anti-Israel views have grown and expanded their influence on policy-making and political discourse. Their political agendas are focused on slandering Israel and do not advance any vision of a shared, stable future, prosperity and development of marginalized groups, or long-term cooperation.

   The ENP should therefore adopt a strict conditionality policy that excludes from funding NGOs that, through extreme views and hostile language, promote adversarial activities aiming to undermine the legitimacy of Israel’s existence and harming diplomatic relations between the EU and Israel. It is not sufficient to ensure that the specific EU-funded project does not promote these hostile activities; an NGO in receipt of any EU funds must adhere to these standards. Any peace-building policy must corroborate the beneficiaries’ commitment to dialogue.
3. The ENP must improve transparency of decision making and evaluation processes of all funding mechanisms.

Information regarding decision making and evaluation processes of all EU funding mechanisms must be made transparent. The EU has consistently refused to release relevant information related to its funding for NGOs involved in the Arab-Israeli conflict. Such refusals reinforce concerns about the irresponsible funding of NGOs with agendas that undermine EU foreign policy.

4. Revise EU policy that simultaneously funds and consults with political NGOs, as reflected in ENP Reports.

In seeking to attain an accurate picture on human rights, the EU should consult with a wider range of civil society organizations in the ENP process and subject NGO statements to careful scrutiny and independent verification. Given the numerous instances in which NGO statements on Israel have been shown to be inaccurate or misleading, caution must be exercised in repeating NGO claims in the ENP Progress Report.

5. The EU should establish a working definition of antisemitism that includes virulent anti-Zionist propaganda and dehumanization of Israel as a form of modern antisemitism. This definition should build on the Fundamental Rights Agency’s (FRA) previous working definition that was removed from its website in 2013.

6. The EU should include a work plan for combating antisemitism in the ENP goals and programs. Growing antisemitic sentiments in ENP countries, mostly connected to Israeli policies, thwarts any attempt to strengthen political dialogue and societal cooperation. Measuring and reporting on antisemitism and anti-Israel demonization is necessary in order to foster adequate policies and programs that address these issues.

7. Adopt and enforce a rigorous code of conduct for EU-funded NGOs and all NGOs that contribute to the ENP. Groups that are involved in antisemitic or virulently anti-Israel rhetoric and activities should be ineligible to receive EU funding.
PART 1: EU POLICY AND THE ARAB-ISRAELI CONFLICT

Introduction

The European Union’s understanding of the Arab-Israeli conflict reflects a flawed approach to the complexities of the Middle East region. As stated on the EU Delegation to Israel website: 2 “Resolution of the Arab-Israeli conflict is a strategic priority for Europe. Until this is achieved, there will be little chance of solving other problems in the Middle East.” (emphasis added). Similar notions appear in many formal EU documents.

This characterization of Israel as the basis of all Middle East unrest is reflected throughout the ENP (see section 1.2 below). This perception persists despite developments of the past five years, including the so-called “Arab Spring,” the ongoing conflict in Syria, and the growing influence of the extremist Islamic State. These events must be carefully considered as the EU reexamines its approach to the region under the ENP.

The misperception of Israel in the regional context is compounded by a severe misunderstanding of Israeli society and Israeli policy. This undermines the ENP objectives to “support partners who undertake reforms towards democracy, rule of law and human rights.” 3

Two major ENP flaws regarding Israel stand out: First, the EU undermines its own declared mission by funding compulsively adversarial NGOs that advance an anti-Israel agenda. These NGOs – in Israel, the West Bank, and Gaza – are overtly politicized and often promote political agendas that contradict EU policies, including: advocacy for a one-state formula that would effectively eliminate the State of Israel as a Jewish state; the use of demonizing discourse in an attempt to criminalize Israel, in opposition to the EU position of Israel as a democratic state; and the advancement of BDS (boycott, divestment and sanctions) and anti-normalization that go directly against EU policies in support of engagement and dialogue.

Second, the ENP ignores or downplays constant Palestinian incitement to hatred against Jews and Israelis in schools, media, and public forums. The de-humanization of Jews and Israelis and glorification of murderers as “martyrs” are constant features in Palestinian society, and rarely face condemnation by senior Palestinian officials. This propaganda undermines possibilities of dialogue and coexistence, yet it is hardly acknowledged by the ENP as an impediment for

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peace nor is it being tackled through EU funding to civil society.

In summary, NGO Monitor outlines the ways in which the current ENP contradicts its principle goal of fostering development with Israel and creating the conditions for a viable peace. A revised EU policy must include attention to NGO activities – and EU funding patterns – that both exacerbate the conflict and undermine EU objectives.

1.1 Reliance on NGOs in place of EU/Israel political dialogue

The EU/Israel Action Plan specifies the importance of political cooperation that builds on common shared values of “democracy, respect for human rights and the rule of law and basic freedoms.” Although Israel and the EU share these ideals, political cooperation has not extended to such vital fields such as human rights, conflict management, and diversity management. Instead, the EU attempts to engage on these issues outside of accepted diplomatic channels, through projects funded under ENP programs and carried out by a narrow segment of political NGOs. This exploitation of human rights and international relations by the EU is magnified by the misuse of European taxpayer funds, and the violations of diplomatic norms and accepted relations between states.

EU engagement through NGOs instead of the Israeli government has led to misunderstanding of Israeli policy and contributes to missed opportunities to cooperate on shared challenges. As a consequence, the EU overemphasizes Israel’s relations with the Palestinians and disregards other important aspects of Arab-Israeli relations. Humanitarian, human rights, and development projects also almost exclusively target Palestinian populations and the “Arab minority” in Israel, discounting Israeli society’s complex diversity and various other minority groups.

By funding NGOs and programs focused solely on criticizing Israeli policy in the West Bank and Gaza, the ENP endorses a narrative where relations with Israel are reduced to Israel’s alleged inhumane treatment of Palestinians. NGO projects in these areas, carried out by organizations such as Machsom Watch, B’Tselem, Yesh Din, and Bimkom, attempt to portray systematic violations of human rights and “apartheid.” (For detailed funding information, see Part 3 Funding Appendix below.)

Engaging with a broader range of NGOs across the political spectrum would radically change EU perception of the reality in Israel and the Palestinian areas. NGOs advance a political agenda that discounts Israel’s security concerns, existing Arab-Israeli cooperation, and prospects of negotiations between the parties to the conflict. NGOs disregard growing Palestinian radicalization, which has led to increasing violence against Israeli targets within Israel and Area C of the West Bank, requiring security measures such as checkpoints and movement restrictions. The NGO-driven narrative also fails to acknowledge positive Israeli-Palestinian collaboration such as Palestinian students in Israeli educational institutions, Palestinian workers in Israeli enterprises, and Israeli-Palestinian

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administrative arrangements (water resources, planning and construction, transport etc.). In fact, EU-funded NGOs, such as NGO Development Center (NDC), actively discourage cooperation and shared futures through anti-normalization campaigns.  

With respect to the Arab citizen minority in Israel, EU-funded NGOs such as Adalah, Mossawa, and Association for Civil Rights in Israel (ACRI) consistently focus on this population as a monolithic segment of Israeli society, with Israel as a systemic violator of minority rights. These NGOs aim to represent Israel as a uniquely racist state, while discounting its diverse and complex society. Indeed, the Arab minority itself is not monolithic, but fragmented into different cultural and religious groups, which increasingly demand separate recognition and specific accommodations. Moreover, by focusing funding and projects exclusively on the Arab minority, the ENP does not consider other minority groups equally worthy of protection, including the Ethiopian Jewish group, the Jewish strictly Orthodox group (also known as ultra-Orthodox), the Circassian minority, Druze, and Christian minorities. The EU should review its policy in order to understand why these other groups have not yet benefited from EU programs.

Lastly, the lack of political dialogue with Israel and the adoption of NGO narratives instead have prevented the EU and Israel from developing meaningful cooperation regarding mutual challenges, further undermining ENP goals. These include the following: Roma/Sinti in Europe and the Bedouin in Israel; refugees/asylum seeker issues; integration of religious and ethnic minority groups; and controversial issues facing both EU states and Israel regarding the protection of political movements that challenge the constitutional order of the state and potentially hostile groups.

1.2 Misguided funding for political advocacy NGOs

The EU (and member countries) directly and indirectly funnels millions of euros a year to NGOs active in the Arab-Israel conflict through ENP funding frameworks. The problematic NGO activities outlined below – notably BDS and anti-normalization with Israel – demonstrate the ways in which this funding undermines EU policy. Given the deliberately inflammatory actions and statements of these NGOs, the EU must reconsider its current and future relationship with these groups in the ENP.

NGO funding mechanisms

NGOs play a twofold role of implementing EU human rights and conflict management policy: they carry out EU-funded projects, and serve as counselors for formulating EU policies. Indeed, NGOs are the primary actors of ENP human rights, development, and conflict management programs and, simultaneously, they further their political agenda by submitting reports and participating in workshops and consultation rounds organized by the European Commission and the EU Delegations. Because these NGOs undermine EU policy by promoting BDS

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NGO Monitor, “NGO Development Centre” http://www.ngo-monitor.org/article/ngo_development_center_ndc_0
and anti-normalization, among other means of demonizing Israel, project funding for Arab-Israeli “collaboration” via these NGOs only increases Israeli distrust in the EU as an honest broker in the peace process.

NGOs receive millions of euro through two primary funding mechanisms: Partnership for Peace (PfP) and European Instrument for Democracy and Human Rights (EIDHR).

**Partnership for Peace (PfP)**

In 2005, the EU launched the “Partnership for Peace Programme” (PfP), devoted to support cooperation between Arabs and Israelis. PfP calls have set forth three major priorities: influencing media and policy-making, developing joint Arab-Israeli socio-economic initiatives, and advancing peace education. According to the objectives of the program, PfP aims to create appropriate conditions for peace by working with civil society organizations (CSOs).

Nevertheless, PfP has become another framework for the pursuit of an anti-Israeli agenda. Many of the civil society organizations funded under this program are active participants in the Durban strategy that exacerbates the conflict by promoting anti-Israel campaigns. A blatant disregard of Palestinian incitement to hatred, constant condemnations of only Israel, and support for anti-normalization policies are intrinsic to many of the NGOs that receive funding through PfP. In 2013 and 2014, PfP narrowed the scope of joint actions to East Jerusalem, Area C, and the Seam Zone, where the “most affected communities by the conflict” supposedly live. While aiming to encourage cooperation between “Jews and Arabs,” PfP disproportionately focuses on the Palestinian side, ignoring Israelis living in these same areas or those living near Lebanon and Gaza.

The EU’s attempt to boost cooperation between Israelis and Arabs is blatantly contradicted by the organizations funded under PfP (see Part 3 Funding Appendix below). Beneficiaries include, among others: Palestinian Women’s Affairs Technical Committee, which promotes BDS; IKV Pax Christi, a Catholic organization that promotes BDS through theological delegitimization of Israel and Zionism; Applied Research Institute Jerusalem, which demonizes Israel by accusing it of colonization and ethnic cleansing; Ma’an Development Center, which supports BDS; and Parents’ Circle Families Forum, which promotes a highly biased view of the conflict based on a Palestinian narrative and draws an immoral equivalence between terror victims and terrorists.

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10 NGO Monitor, “Ma’an Development Centre”, http://www.ngo-monitor.org/article/ma_an_development_center
After ten years of activities and more than €45 million disbursed to NGOs via the PfP program, the Arab-Israeli conflict has progressed little, calling into question the efficacy of these funds.

PfP failings have been recognized in a commissioned evaluation of EU cooperation with the Palestinian Authority12, which stated:

...the Regional Programme “Partnership for Peace” is undermining the credibility of EU efforts on behalf of Palestinian Civil Society. These statements partly derive from non-normalization movements and lack of acceptance of Cooperation with Israel, partly from concerns about unbalanced participation between Israeli and Palestinian actors, financial motivations as key drivers, and the limited effectiveness and impact potential of these exercises. Moreover these interventions have been perceived by the Civil Society actors interviewed as suffering from a significant level of corruption through “easy to get funds”, lack of monitoring and poor results.

Given concerns from both the Israeli and Palestinian sides, especially in terms of anti-normalization, poor evaluation, and corruption, the ENP must thoroughly revise its entire policy toward the conflict and scrupulously assess the NGOs’ privileged partnership with ENP.

**European Instrument for Democracy and Human Rights (EIDHR)**

One of the EU’s major financial assistance programs is the European Instrument for Democracy and Human Rights (EIDHR). With an approximate annual budget13 of €160 million, program objectives are to provide “support for the promotion of democracy and human rights in non-EU countries.” Through EIDHR, EU funding is allocated to projects conducted by EU-selected NGOs and institutions. These projects revolve around EIDHR’s ten focal themes14: torture; democracy – rule of law; fighting impunity; economic, social and cultural rights; fundamental rights protection; gender women’s rights; human rights education capacity building; racism; discrimination; and children’s rights.

NGO Monitor’s analysis of EIDHR funding in 2007-201015 (the most recent available comprehensive data) reveals that local projects in Israel, local projects in “OPT,” and projects that address Israel and “OPT” jointly received more than €11 million – more than any other target country. Israel and “OPT” received a majority (57%) of EIDHR country based support funding directed at the Middle East, while Syria, Iraq, Iran, Oman, Saudi Arabia, and the UAE received no funding for EIDHR projects directed at specific countries.

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14 http://www.eidhr.eu/highlights
15 NGO Monitor, “EIDHR: Additional European Funding for Mideast Conflict Groups” http://www.ngo-monitor.org/article/eidhr_additional_european_funding_for_mideast_conflict_groups0
The majority of these EIDHR grants support NGOs that adopt and promote a demonizing or delegitimizing narrative about Israel, such as Adalah, Baladna, and Arab Association for Human Rights, as well as engage in political warfare campaigns against Israel, such as B’Tselem and Yesh Din. (See Part 3 Funding Appendix below.)

**Boycott, divestment, and sanctions (BDS) and anti-normalization**

BDS (boycott, divestment, and sanctions) is the main component of the “Durban strategy.” Formulated by NGOs during the 2001 UN-sponsored “World Conference against Racism, Racial Discrimination, Xenophobia and Related Intolerance” in Durban, South Africa, this strategy calls for the complete isolation of Israel defined as a “racist” and “apartheid state.” Tactics in this political war against Israel, including comparisons to apartheid South Africa and false accusations of “war crime,” reflect the exploitation of human rights and double standards. Although BDS activists attempt to hide the movement’s ideology behind the mantra of “ending the occupation,” it aims for the total elimination of Israel as a Jewish state by denying any Jewish right of self-determination and calling for the return of Palestinians to all of the State of Israel. Prominent BDS activist Omar Barghouti has stated his unequivocal support for a “unitary state, where, by definition, Jews will be a minority.” He also justifies Palestinian violence and employs classic antisemitic rhetoric, such as accusations that Jews contaminate Gaza’s water supply and Israeli actions “are reminiscent of common Nazi practices against the Jews.”

BDS campaigns are conducted by radical activists and NGOs, including organizations that receive EU funding through ENP programs. This has had severe consequences on EU-Israel relations: it discredits the EU role as a peacemaker between Israelis and Palestinians, and contributes to the goals of those political NGOs seeking to isolate Israel through de-legitimization.

BDS activists also seek to pressure governments and businesses to adopt their tactics through Corporate Social Responsibility (CSR) discourse that falsely accuse Israeli companies and companies doing business with Israel of violating Palestinian rights. However, international humanitarian law applies only to states and not private companies, highlighting the inherent contradictions of CSR initiatives. Furthermore, NGO campaigners exhibit blatant double standard whereby Morocco, occupying Western Sahara, is not judged according to the same principles, reinforcing BDS’s uniquely anti-Israel goals.

NGOs active in BDS campaigns that receive direct or indirect funding from the EU

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and European states include: Coalition of Women for Peace (CWP)\(^{21}\), which initiated the “Who Profits” campaign\(^{22}\), an activist tool and a database that identifies targets\(^{23}\) for anti-Israel divestment and boycotts; Ma’an Development Center\(^{24}\), which promotes the “apartheid narrative”; IKV Pax Christi\(^{25}\), a Catholic organization that promotes BDS through theological de-legitimization of Israel and Zionism; and Palestinian Women’s Affairs Technical Committee\(^{26}\), a signatory of the 2005 call for BDS\(^{27}\) and current proponent of BDS\(^{28}\). (For detailed funding information, see Part 3 Funding Appendix below.)

In addition, several NGOs funded under ENP programs promote an “anti-normalization policy” of Palestinian noncooperation with Israeli entities. This blatantly undermines EU efforts to strengthen dialogue, mutual exchange, and recognition, which are essential to a shared future for Israelis and Palestinians.

In 2008, four Palestinian organizations drafted the “Palestinian NGOs Code of Conduct,”\(^{29}\) which outlined a clear plan of anti-normalization against Israel. The NGO Development Center (NDC)\(^{30}\), which facilitated the “Code of Conduct,” is an active player in promoting BDS, and has been financially supported by European governments and the EU. Other EU-funded organizations that partner in NDC-managed programs include the Palestinian Hydrology Group, the Union of Agricultural Work Committees, the Jerusalem Legal Aid and Human Rights Center Association, and Addameer. These organizations consistently receive funding under ENP programs (see Part 3 Funding Appendix below). By supporting organizations that refuse to work with Israeli partners, the EU destabilizes its role as champion of peace and simultaneously reinforces extremist views within the Palestinian community.

### 1.3 Anti-normalization: a stumbling block to fulfilling ENP goals

Political NGOs are not the only parties responsible for anti-normalization; European neighborhood countries also participate in this anti-peace agenda – in direct contradiction to the Barcelona Process.

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\(^{24}\) NGO Monitor, “Ma’an Development Centre”, http://www.ngo-monitor.org/article/ma_an_development_center


\(^{27}\) BDS Movement, “Palestinian Civil Society Call for BDS”, http://www.bdsmovement.net/call


\(^{30}\) NGO Monitor, “NGO Development Centre”, http://ngo-monitor.org/article/ngo_development_center_ndc_0
The Barcelona Process, which started with the Barcelona Declaration (1995)\(^{31}\) of the then 15 EU Member States and 12 Mediterranean partners, including Israel and the Palestinian Authority, was aimed at laying the basis for a closer cooperation between the countries of the Mediterranean and the EU, as well as among themselves. The parties agreed to encourage regional cooperation and integration, by establishing economic and financial partnerships, and undertake measures to facilitate human exchange.

According to the EU database\(^{32}\), the Commission “has supported the Barcelona Process with €16 billion from the community budget” and many more billions in loans from the European Investment Bank (EIB). The Barcelona Process was integrated into the Union for the Mediterranean and is part of the ENP, which was introduced in 2004.

The roots of anti-normalization towards Israel are deeply entrenched in the Middle East and continuously serve as an impediment to the EU vision for its southern neighborhood. These trends originate in the Arab hostility to the creation of Israel in 1948. Anti-normalization with Israel is very common in the political culture of much of the Arab and Muslim world.

For instance, constitutional and legislative initiatives in Tunisia that threaten to criminalize relations with Israel are backed by NGOs\(^{33}\); anti-normalization activists would not allow a Euromed conference that included Israeli delegates\(^{34}\) to be held in Morocco; the Israeli embassy in Cairo was attacked by a mob; and concerns that anti-normalization forces in Jordan are gaining strength\(^{35}\) are heard often.

Despite the trend’s counter-productive influence on EU vision for the region, the ENP does not identify these trends as harmful to its goals. No EU funding is allocated to combat this phenomenon through educational civil society activity.

In fact, as NGO Monitor’s research shows and discussed above, it is the contrary – the EU and other European governments often fund groups that call and act to deny any chance of normalization with Israel.

### 1.4 Applying the principle of Conditionality on NGOs

Conditionality and fungibility principles are central elements in EU funding mechanisms to third countries. On this basis, the European Court of Auditors (ECA) criticized efficiency of EU human rights policies in several states. In particular, the efficacy of the PEGASE funding mechanism (direct funding to the Palestinian

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\(^{34}\) Ynet News, “Israeli Flags Burnt in Morocco Rally”, [http://www.ynetnews.com/articles/0,7340,L-4207903,00.html](http://www.ynetnews.com/articles/0,7340,L-4207903,00.html)

Authority) was criticized in a 2013 special report. The ECA also critiqued human rights and governance funding to Egypt and the Congo, identifying a lack of conditionality and policy dialogue, vaguely defined priorities, and mismanagement of relations with Civil Society Organizations as main causes of inefficacious impact.

The rationale behind this criticism should be similarly applied to funding for NGOs. Problematic organizations that receive funding are shielded by EU claims that it does not provide general funding to NGOs, but only specific funding for individual projects. This weak response clearly ignores fungibility—any funding enables an NGO to sponsor other activities with a political agenda inconsistent and even contradictory to the ENP. NGO Monitor’s research has shown that this is a common practice particularly with regards to EU policy on peace, security, democracy, and recognition of the Jewish nature of the state of Israel.

By funding organizations that fail to promote ENP values, the EU harms its ability to play a constructive role in the peace process, undermines its credibility, and continues to turn Israeli public opinion against the EU. To counteract this, the EU should revise its parameters for funding and introduce in ENP programs a strict conditionality policy that requires beneficiaries of funding to abide by EU principles. EU must ensure that not only do specific projects conform to EU principles, but the organization conforms as well.

Conclusion

BDS campaigns, anti-normalization, and the other types of delegitimizing behavior cited above stand in contrast to the vision of the ENP, the Barcelona Process, and other EU-supported policies. While the ENP does not endorse the damaging agendas, it has nonetheless substantially funded organizations that promote these policies. The EU currently does not prioritize addressing these phenomena, and by extension, directly or indirectly encourages it. Due to extensive European funding, once-fringe NGOs that espoused hostile views have grown and extended their influence on policy-making and political discourse. Their political agenda is focused on slandering Israel and does not advance any vision of a shared, stable future, prosperity and development of marginalized groups, or long-term cooperation. The EU should also closely link the ENP to wider security considerations and foreign issues, and ensure that the EU consults with all relevant shareholders.

PART 2: THE EUROPEAN NEIGHBORHOOD POLICY AND ANTISEMITISM

2.1 The need for a revised working definition of antisemitism

Numerous antisemitic incidents occurred throughout Europe in the summer of 2014, often coinciding with anti-Israel rallies concerning the Gaza fighting. This increase in antisemitism was not coincidental: it demonstrated the extent to which the Arab-Israeli conflict impacts the lives of Europe’s Jews. Although some European leaders condemned these acts, European governments were largely unable to curtail anti-Jewish violence and harassment.

This was due, in part, to the EU’s lack of a clear definition of antisemitism or an acknowledgment of its root causes. In order to combat antisemitism today, the EU must establish a revised working definition that accounts for manifestations of Jew-hatred motivated by contemporary developments, including the Arab-Israeli conflict and political warfare against Israel.

According to the 2013 EU Fundamental Rights Agency (FRA) survey on antisemitism, attacks on Jewish targets are primarily connected to periods of turmoil in Israel and Palestinian territories or justified as “protests” against the Israeli policy. The surge in antisemitic events during the summer of 2014 confirms this assertion. The EU’s previous working definition of antisemitism, as elaborated by the FRA, incorporated anti-Zionist and anti-Israeli sentiments: “new antisemitism, sometimes also referred to as anti-Zionism. This form of antisemitism is expressed in a system of beliefs, convictions and political activities focused around the conflict in the Middle East.”

However, this definition was removed from the FRA website in December 2013, a decision that was welcomed by antisemitic groups such as “Electronic Intifada,” which labels Israel a Nazi state and advocates for its elimination.

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44 The Electronic Intifada, “Israel Lobbyist Finally Concede that EU has ditched anti-semitism “definition””, https://electronicintifada.net/blogs/ben-white/israel-lobbyists-finally-concede-eu-has-ditched-anti-semitism-definition
46 The Electronic Intifada, “Why Israel Won’t Survive”, https://electronicintifada.net/content/why-israel-wont-survive/7999
Since the removal of the FRA’s definition, EU and European government policy have reverted to a focus on “classical” displays of Jew-hatred, failing to recognize “anti-Zionism” as a pretext for antisemitism. For example, in March 2015 the German government refused to label BDS as motivated by antisemitic ideas. In a similar vein, a German judge ruled that an attack on a synagogue perpetrated by two German youths of Palestinian origin during the violent demonstrations of summer 2014 amounted to “political action,” rather than an act that deliberately targeted a place of Jewish worship motivated by anti-Jewish hatred.

The EU’s failure to define, acknowledge, and curb antisemitism in its modern form has had dire consequences. Jewish emigration from Europe has reached record numbers, with French Jews leading the departure. Little can be done to combat this phenomenon while European governments continue to disregard the implications of the Arab-Israeli conflict for Europe’s Jews.

NGO Monitor recommends that the EU implement a working definition similar to that adopted by the 2010 Ottawa Convention on Combating Antisemitism, or outlined by the U.S. Department of State Fact Sheet “Defining Anti-Semitism.” The U.S. Department Fact Sheet lists the following criteria of antisemitism “with regard to the state of Israel”:

**DEMONIZE ISRAEL:**

- Using the symbols and images associated with classic anti-Semitism to characterize Israel or Israelis
- Drawing comparisons of contemporary Israeli policy to that of the Nazis
- Blaming Israel for all inter-religious or political tensions

**DOUBLE STANDARD FOR ISRAEL:**

- Applying double standards by requiring of it a behavior not expected or demanded of any other democratic nation
- Multilateral organizations focusing on Israel only for peace or human rights investigations

**DELEGITIMIZE ISRAEL:**

- Denying the Jewish people their right to self-determination, and denying Israel the right to exist

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2.2 ENP priorities and work plans

NGO Monitor recommends that the EU incorporate the revised working definition of antisemitism into the ENP. The definition would be used in ENP programs and instruments as a benchmark, in order to combat, measure, and report on the state of antisemitism in Europe and neighborhood countries.

Using the working definition, ENP Reports would document political antisemitism with regards to the State of Israel – including demonization, application of double standards, and delegitimization; Holocaust denial 53 or trivialization 54; the publication and distribution of antisemitic literature such as the Protocols of the Elders of Zion55; and traditional antisemitic imagery, such as blood-libels56.

By introducing the fight against antisemitism as a priority, ENP programs and instruments would be used to tackle the growing rate of antisemitism in the Mediterranean and Middle East regions that jeopardize the Israel-Arab peace process. Specifically, the ENP, CBSS, EIDHR and PfP work plans applied to the Palestinian Authority will combat the use of antisemitic rhetoric to demonize Jews57, promote conspiracy theories58, and incite violence59 and hatred against Israeli citizens. The annual ENP Report on the Palestinian Authority should include the monitoring of antisemitism in the media and public speech.

Finally, NGO Monitor recommends that the EU classify Europe’s Jews as a vulnerable group, and apply the working definition to confront antisemitic sentiment fueled by anti-Israel or pro-Palestinian activists active in ENP Programs and Instruments. These include EIDHR, PfP, Investing in People, as well as other programs managed by the EU Commission that have activities in Israel and the Palestinian Authorities, such as the EVS (European Volunteer Service).

2.3 Preventing EU-funded NGOs from promoting global antisemitism

Antisemitism through Israel demonization is a common problem among some NGOs that receive EU funding. NGO Monitor recommends that the EU establish a rigorous NGO Code of Conduct in order to prevent NGOs active in the Arab-Israeli conflict from using EU funds to promote antisemitic and anti-Israel propaganda in media and public speech. The Code would also create a barrier of entry from participation in the ENP submission process for those NGOs that do not meet the required conditions.

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53 The Middle East Media Research Institute, “Former Mubarak Advisor Dr. Osama Al-Baz, Who Died Recently, Denounced Antisemitism, Debunked Antisemitic Myths”, http://www.memri.org/report/en/0/0/0/0/0/0/7411.htm
54 Palestinian Media Watch, ““There were between one and two million Jewish victims” of the Holocaust, says official PA daily”, http://palwatch.org/main.aspx?fii=157&doc_id=14544
Many EU-funded NGOs claim to promote human rights and understanding among Israelis and Palestinians, but instead exploit the Arab-Israeli conflict to promote a one-sided and highly biased narrative against the Jewish State. These groups include international NGOs (Amnesty International, Human Rights Watch), Palestinian NGOs (MIFTAH, BADIL, Sabeel, Kairos Palestine, Electronic Intifada, Gaza Community Mental Health Programme), and Israeli groups (Alternative Information Center, Israeli Committee Against House Demolitions).

Contemporary antisemitism is evidenced in NGO political campaigns based on the strategy adopted by the NGO Forum of the 2001 Durban Conference (the UN World Conference against Racism, Racial Discrimination, Xenophobia and Related Intolerance, September 2001). This includes BDS and legal attacks (“lawfare”) on Israel. These campaigns regularly include token radical fringe Jewish groups, recruited in an attempt to deflect accusations of antisemitism – it's itself a form of antisemitism.

When conducting anti-Israel campaigns, and especially during periods of intense conflict (e.g. the 2014 Gaza War), NGOs frequently use opposition to Israeli policies as a cover for antisemitism. This is usually tied to accusations of Israeli “war crimes” and human rights violations, which reinforce these campaigns. Contrary to NGO claims of engaging in “legitimate criticism” of Israel, the NGO rhetoric, publications, and activities often violate accepted standards.

Some NGOs even employ classical antisemitic tropes to demonize Israel. The NGO Miftah, founded by Palestinian activist Hanan Ashrawi and funded by the EU through the Anna Lindh Foundation, published an article (March 27, 2013) that accused Jews of using Christian blood for Passover. Although the article was later removed and followed by a late apology, Miftah’s publications have demonstrated a consistent pattern of incitement to hatred and violence, including the glorification and praising of terrorists who kill Jews. BADIL, another Palestinian NGO funded by several European states and by EU-funded NGOs Trócaire and

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64 NGO Monitor, “BDS in the Pews: European, US and Canadian Funding Behind Anti-Israel Activism in Mainline Churches”, http://www.ngo-monitor.org/article/bds_in_the_pews_european_us_and_canadian_government_funding_behind_anti_israel_activism_in_mainline_churches
66 NGO Monitor, “Gaza Community Mental Health Programme”, http://www.ngo-monitor.org/article/gaza_community_mental_health_programme_gcmhp_0
DanChurch Aid, awarded a prize (May 5, 2010) to a blatantly antisemitic cartoon. The cartoon featured a grotesque caricature of a Jewish man standing over a dead Arab child and holding a pitchfork dripping with blood.

The EU’s failure to address the question of anti-Israel sentiment fueled by EU-funded NGOs only contributes to the growing rates of antisemitism that target Jews in Europe, perceived as “responsible” for Israel’s policies toward Hamas, the Palestinian Authority, and terrorism.

In summary, NGO Monitor recommends that:

- The EU adopt a rigorous NGO Code of Conduct requiring groups that receive EU funding and participate in the ENP submissions process to adhere to the standards set forth by the revised working definition of antisemitism.

- The Code of Conduct be used to block funding to groups involved in anti-Israel incitement that promotes and justifies antisemitism.

In this context, NGO Monitor notes the guidelines adopted by the Ford Foundation following the 2001 Durban Conference. These guidelines prohibit funding of “groups that promote or condone bigotry or violence, or that challenge the very existence of legitimate, sovereign states like Israel.”

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74 NGO Monitor, “Ford Foundation: 2006 Update on Funding for Political NGOS Active in the Israeli-Palestinian Conflict,” http://www.ngo-monitor.org/article/ford_foundation_update_on_funding_for_political_ngos_active_in_the_israeli_palestinian_conflic
PART 3: FUNDING APPENDIX

The funding appendix discloses organizations and projects funded through a variety of European Union frameworks. Some of the information found in the final table may reflect funding referenced in other tables.

The European Union delegation in Israel provides direct funding to many local NGOs, which appear in the table below.

<table>
<thead>
<tr>
<th>Title</th>
<th>Grant Beneficiary</th>
<th>Partner/s</th>
<th>Starting date/End date</th>
<th>EU contribution EUR</th>
<th>Project Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arab Youth Against “Honour Killings”</td>
<td>Baladna and Kayan</td>
<td></td>
<td>2/2014 to 07/2016</td>
<td>€231,939.00 (90% of total)</td>
<td>Description: The aim of the project is to uphold the human rights of women as articulated in the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), and specifically to offer protection against so-called “honour” killings and related violence.</td>
</tr>
<tr>
<td>Combating Impunity: Torture and CIDT Prevention, Accountability and Rehabilitation in Israel/oPt</td>
<td>ADALAH-THE LEGAL CENTER FOR ARAB MINORITY RIGHTS IN ISRAEL</td>
<td></td>
<td>11/2013 to 10/2016</td>
<td>€717,994.00 (80% of total)</td>
<td>The overall objective is to combat and prevent torture and ill-treatment of Palestinian prisoners incarcerated in Israeli prisons and detention centers and Palestinian civilians in the Occupied Palestinian Territory (oPt)</td>
</tr>
<tr>
<td>Enhancing and Mainstreaming Anti-Racism Education in Israel</td>
<td>ACRI- The Association for Civil Rights in Israel</td>
<td></td>
<td>09/2012 to 09/2014</td>
<td>€157,100.00 (68% of total)</td>
<td>The objective of the project is to reduce racism in the education system by improving and mainstreaming anti-racism education through development of new curricula, training educators and changing policies.</td>
</tr>
<tr>
<td>Project Title</td>
<td>Organization</td>
<td>Start Date</td>
<td>End Date</td>
<td>Amount (€)</td>
<td>Percentage of Total</td>
</tr>
<tr>
<td>------------------------------------------------------------------------------</td>
<td>---------------------------------------------------</td>
<td>------------------</td>
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<td>---------------------</td>
</tr>
<tr>
<td>Legal Aid to Combat land takeovers and displacement of Palestinians in the South Hebron Hills, Hebron district and Bethlehem region</td>
<td>Rabbis for Human Rights</td>
<td>11/2012 to 10/2015</td>
<td>€197,000.00 (53.39% of total)</td>
<td>The project aims to use legal intervention to protect Palestinian land owners’ rights.</td>
<td></td>
</tr>
<tr>
<td>Promoting Adequate Planning and Development of Recognized Bedouin Villages in the Israeli Negev</td>
<td>Bimkom</td>
<td>02/2012 to 01/2015</td>
<td>€193,036.00 (87.55% of total)</td>
<td>The overall objective of the project is to advance the rights of the Negev Bedouin to adequate housing and living conditions, as well as opportunities for economic development, based on sufficient funding, suitable regulation and appropriate planning.</td>
<td></td>
</tr>
<tr>
<td>Promoting and Protecting the Rights of the Arab Bedouin of the Nacab</td>
<td>Adalah-The legal center for Arab minority rights in Israel</td>
<td>01/2013 to 12/2014</td>
<td>€162,556.00 (90% of total)</td>
<td>The project aims to advance the rights of the Arab Bedouin citizens of Israel living in unrecognized villages in the Nacab</td>
<td></td>
</tr>
</tbody>
</table>
| Promoting Recognition of Bedouin Villages based on their Rights, Needs and Active Participation | Bimkom and ACRI- The Association for Civil Rights in Israel | 01/2014 to 12/2016 | €250,000.00 (88.70% of total) | The project seeks to advance the rights of Bedouin residents in the unrecognized villages through: (i) advancing recognition of the unrecognized Bedouin villages on a village by village basis; (ii) strengthening capacities of Bedouin communities to take an active role in planning processes and drive positive change for their communities; (iii) advancing respect of human rights in government policies; (iv) fostering support of
<table>
<thead>
<tr>
<th>Key Stakeholders in the Negev</th>
<th>Protecting and Advancing Palestinian Minors’ Rights in the Military Justice System</th>
<th>01/2014 to 12/2015</th>
<th>€233,043.00 (88% of total)</th>
<th>The objective of the project is to protect the rights of Palestinians, particularly of Palestinian minors, in the Israeli military justice system, and to ensure respect for Israel’s obligations according to international humanitarian law and international human rights law with an emphasis on the rights of minors.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Safeguarding the Rights of Migrants and Refugees in Israel</td>
<td>Hotline for Migrants and Refugees</td>
<td>01/2014 to 12/2015</td>
<td>€346,164.00 (80% of total)</td>
<td>The aim of the project is to introduce and support a transparent and fair immigration policy and legislative horizon in accordance with international conventions, which better takes into account the rights of migrants and asylum seekers.</td>
</tr>
<tr>
<td>SHABAB - Youth for Change</td>
<td>Arab Association for Human Rights</td>
<td>01/2013 to 06/2015</td>
<td>€197,974.00 (78.80% of total)</td>
<td>The aim of the project is to promote Human Rights through empowerment, education and civic participation of Palestinian Arab youth to mainstream Human Rights to face racist trends in Israel.</td>
</tr>
<tr>
<td>Standing Idly: the duty to intervene as an integral part of the IDF’s duty to protect Palestinians and their property in the West Bank</td>
<td>Yesh Din</td>
<td>01/2013 to 12/2014</td>
<td>€199,610.00 (89% of total)</td>
<td>The objective of the project is to promote and improve the protection of human rights of Palestinian civilians in the West Bank by Israel, in line with its duties and obligations under international law and to increase accountability on ISFP and the Israeli military law enforcement authorities.</td>
</tr>
<tr>
<td>Project Title</td>
<td>Organization</td>
<td>Duration</td>
<td>Funding</td>
<td>Funding Details</td>
</tr>
<tr>
<td>------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------</td>
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</tr>
<tr>
<td>Strengthening Democratic Participation of the Arab Minority</td>
<td>Mossawa- The centre for Advocacy for Arab citizens</td>
<td>01/2014 to 12/2015</td>
<td>€246,725.00 (90% of total)</td>
<td>The overall objective of the project is to promote the rights of the Arab minority through strengthening democratic participation, empowerment and advocacy in the legislative, governmental and public arenas in Israel.</td>
</tr>
<tr>
<td>Strengthening the socioeconomic rights of Palestinians in East Jerusalem</td>
<td>Ma'an - Workers' Advice Centre WAC</td>
<td>01/2014 to 12/2015</td>
<td>€250,000.00 (80% of total)</td>
<td>The project's overall objective is to contribute to upholding the human rights of the Palestinians in East Jerusalem. The specific objectives are 1/ to facilitate the ability of 2,200 East-Jerusalem residents to overcome systemic blocks to the optimization of their socioeconomic rights; and 2/ to improve protection of human rights for EJ residents in general, who suffer from extreme lack of social services, lack of classrooms, and the danger of losing their residency.</td>
</tr>
<tr>
<td>Writing Wrongs: Restoring Justice and Dignity to Victims of Torture</td>
<td>HAMOKED CENTER FOR THE DEFENCE OF THE INDIVIDUAL ASSOCIATION</td>
<td>09/2013 to 08/2016</td>
<td>€654,423.00 (78% of total)</td>
<td>Overall Objective: Elimination of torture and ill-treatment of Palestinian detainees held by Israeli security forces through joint advocacy and legal action. Specific Objectives: 1. Holding duty bearers responsible through documenting maltreatment and distributing information through the Israeli and international publics. 2. Enforcing the right to restitution through facilitating access to reparations and entitlements.</td>
</tr>
<tr>
<td>Investing in Palestinian culture in Israel and the oPT</td>
<td>Mossawa Center - The Advocacy Center for Arab Citizens Of Israel</td>
<td>12/2011 to 11/2014</td>
<td>€400,000.00 (80% of total)</td>
<td>The overall objective of the project is to empower a sustainable Palestinian culture community through the creation of a supportive political and institutional environment in Israel and the oPt.</td>
</tr>
<tr>
<td>Across Two Narratives: The Israeli-Palestinian Parallel Narrative Experience</td>
<td>Parents Circle - Families Forum: Bereaved Families Supporting Peace, Reconciliation And Tolerance</td>
<td>01/2014 to 12/2015</td>
<td>€479,555.00 (80% of total)</td>
<td>The overall objective of this action is to drive a reconciliation process among Israelis and Palestinians as a necessary catalyst for a negotiated agreement.</td>
</tr>
<tr>
<td>---</td>
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</tr>
<tr>
<td>Provision of sustainable energy services to the communities of the South Hebron Hills in Area C of the West Bank</td>
<td>Comet-Me</td>
<td>01/2014 to 12/2015</td>
<td>€486,913.00 (78.52% of total)</td>
<td>The aim of the project is to promote the possibility of the Two State Solution through joint concrete actions of Jews and Arabs working together to promote socio-economic development of marginalized Palestinian communities in Area C.</td>
</tr>
</tbody>
</table>
The European Union Partnership for Peace provides funding to a number of highly politicized non-governmental organizations active in Israel and the West Bank.

<table>
<thead>
<tr>
<th>Title</th>
<th>Grant Beneficiary</th>
<th>Partner/s</th>
<th>Starting date/End date</th>
<th>Total amount/EU contribution</th>
<th>Project Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Across Two Narratives: The Israeli-Palestinian Parallel Narrative Experience</td>
<td>Parents Circle-Families Forum (IL)</td>
<td>--</td>
<td>01/01/2014 31/12/2015</td>
<td>599,444 479,555</td>
<td>The overall objective of this action is to drive a reconciliation process among Israelis and Palestinians as a necessary catalyst for a negotiated agreement.</td>
</tr>
<tr>
<td>Addressing Israeli Actions and its Land Policies in the oPt</td>
<td>Applied Research Institute Jerusalem (PS)</td>
<td>Land Research Center (PS) Kerem Navot (IL)</td>
<td>04/06/2014 03/12/2016</td>
<td>621,300 497,040</td>
<td>The project monitors, analyses and documents all Israel’s actions and land policies in Palestine, with the aim to disseminate the collected information to key stakeholders, and advocate for a better environment for peace.</td>
</tr>
<tr>
<td>Building sustainable peace though API: regional civil society initiative</td>
<td>The Center for Democracy and Community Development (PS)</td>
<td>Negev Institute for Strategies of Peace and Development (IL) IKV Pax Christi (NL) United Religions Initiative (JO)</td>
<td>02/01/2014 01/01/2016</td>
<td>571,128 456,902</td>
<td>The project works to advance the API at three levels by: 1. facilitating the creation of a dedicated cadre of policy/decision-makers in Palestine, Israel, and the Middle East committed to the API; 2. strengthening the regional civil society network for the support of Middle East peace and security; 3. creating new cadres of youth and marginalized groups for the support of the API in Israel and in the region.</td>
</tr>
<tr>
<td>Supporting Cross Community Activism Among Separated Palestinian Communities</td>
<td>The British Council (UK)</td>
<td>MA’AN Development Centre (PS) Arab Association for Human Rights (IL) SEEDS (UK) Faith Matters (UK)</td>
<td>01/09/2012 31/08/2015</td>
<td>624,934 499,947</td>
<td>Young women and men aged 18-30 from Palestinian communities in the West Bank, Israel, and Jordan will engage through needs-based, shared development projects that they themselves define and manage. Particularly targeted are certain veto communities (e.g. rights-based groups of refugees advocating for the implementation of Resolution 181, groups who do not recognise Israel, etc.). They will learn from each other, become exposed to each others’ realities, and exchange experiences with each other drawing from UK expertise (i.e. in community conflict resolution) where appropriate and relevant.</td>
</tr>
<tr>
<td><strong>Title</strong></td>
<td><strong>Contractor</strong></td>
<td><strong>Co-Applicant</strong></td>
<td><strong>Starting date/End date</strong></td>
<td><strong>Total amount/EU contribution EUR</strong></td>
<td><strong>Summary project description</strong></td>
</tr>
<tr>
<td>-------------------------------</td>
<td>------------------</td>
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<td>-----------------------------</td>
<td>--------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Strengthening human rights and access to information</td>
<td>Stichting Oxfam Novib</td>
<td>Palestinian Centre for Human Rights</td>
<td>01/03/2014 - 29/02/2016</td>
<td>411,861.00</td>
<td>To contribute to the promotion of an informed and engaged civil society in the Gaza Strip which uses its awareness of human rights and fundamental freedoms to hold duty bearers accountable for their failure to respect, protect and fulfil their human rights. SOs: - To improve citizens’ access to information and increase the awareness of marginalized communities, particularly women, youth and people with disabilities, on human rights, democracy and fundamental freedoms. - To increase the community awareness of human rights violations in the Gaza Strip; to act effectively to protect the rights of vulnerable groups as a result of strengthened advocacy and media work and alliance 6 with CBOs.</td>
</tr>
</tbody>
</table>
According to information submitted quarterly to the Israeli Registrar of Non-Profits, in recent years, the European Union has funded the following organizations, some of which have activities that contradict stated EU policy.

<table>
<thead>
<tr>
<th>NGO</th>
<th>Year</th>
<th>Donor</th>
<th>Sum (NIS)</th>
<th>Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alternative Information Center</td>
<td>2013</td>
<td>Papa Giovanni XXIII</td>
<td>74,539$^5$</td>
<td>Promote peace building in Civil Society</td>
</tr>
<tr>
<td></td>
<td>2012</td>
<td></td>
<td>77,038$^6$</td>
<td>Promote peace building in Civil Society</td>
</tr>
<tr>
<td>Geneva Initiative</td>
<td>2013</td>
<td>European Union</td>
<td>498,413</td>
<td>Covering Ongoing Education Activities Expenses</td>
</tr>
<tr>
<td>Rabbis for Human Rights</td>
<td>2012</td>
<td>European Union</td>
<td>248,914</td>
<td>Legal work in south Hebron hills</td>
</tr>
<tr>
<td>Adalah</td>
<td>2014</td>
<td>European Commission</td>
<td>378,471</td>
<td>Human Rights among Arabs-Bedouins</td>
</tr>
<tr>
<td></td>
<td>2013</td>
<td>European Commission</td>
<td>990,017</td>
<td>Torture Project</td>
</tr>
<tr>
<td></td>
<td>2012</td>
<td>European Commission</td>
<td>156,845</td>
<td>Human Rights among Arabs-Bedouins</td>
</tr>
<tr>
<td></td>
<td></td>
<td>European Endowment for Democracy</td>
<td>326,524</td>
<td>Human Rights among Arabs-Bedouins</td>
</tr>
<tr>
<td>Ir Amim</td>
<td>2014</td>
<td>European Endowment for Democracy</td>
<td>138,000</td>
<td>Overall use for the organization</td>
</tr>
<tr>
<td></td>
<td></td>
<td>European Union</td>
<td>229,692</td>
<td>Strengthening Socio-economic rights in East Jerusalem</td>
</tr>
<tr>
<td>The Social TV</td>
<td>2012</td>
<td>EMHRF</td>
<td>24,730</td>
<td>Ongoing support of producing Social TV articles</td>
</tr>
<tr>
<td>Breaking the Silence</td>
<td>2014</td>
<td>European Union</td>
<td>134,959</td>
<td>Educational project</td>
</tr>
<tr>
<td></td>
<td>2013</td>
<td></td>
<td>413,684</td>
<td></td>
</tr>
<tr>
<td>Year</td>
<td>Organization</td>
<td>Funders</td>
<td>Amount</td>
<td>Description</td>
</tr>
<tr>
<td>------</td>
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<td>---------</td>
<td>--------</td>
<td>--------------------------------------------</td>
</tr>
<tr>
<td>2014</td>
<td>ACRI</td>
<td>European Union</td>
<td>389,088</td>
<td>Educational activity against racism</td>
</tr>
<tr>
<td>2013</td>
<td></td>
<td></td>
<td>50,204</td>
<td>Project on democratic values</td>
</tr>
<tr>
<td>2013</td>
<td></td>
<td></td>
<td>1,992</td>
<td>Project to Protect the rights defenders</td>
</tr>
<tr>
<td>2012</td>
<td></td>
<td></td>
<td>210,020</td>
<td>Project to Defend human rights</td>
</tr>
<tr>
<td>2012</td>
<td></td>
<td></td>
<td>308,260</td>
<td>Education against racism</td>
</tr>
<tr>
<td>2012</td>
<td></td>
<td></td>
<td>550,991</td>
<td>Project to promote the Essentials of Democracy</td>
</tr>
<tr>
<td>2014</td>
<td>PHR-I</td>
<td>European Union</td>
<td>62,936</td>
<td>Activities to advance the rights of asylum seekers, in particular to advance rehabilitation and treatment for refugees who are victims of torture</td>
</tr>
<tr>
<td>2013</td>
<td></td>
<td>European Commission</td>
<td>34,387</td>
<td>Promoting health rights for the disadvantaged hurt by the citizenship law and promoting the public activity of the NGO</td>
</tr>
<tr>
<td>2012</td>
<td></td>
<td></td>
<td>228,408</td>
<td>Project for promoting health rights and welfare among the underprivileged due to the citizenship law</td>
</tr>
<tr>
<td>2014</td>
<td>B'Tselem</td>
<td>European Commission</td>
<td>84,872</td>
<td>International humanitarian law</td>
</tr>
<tr>
<td>2014</td>
<td></td>
<td></td>
<td>334,024</td>
<td>Human rights defenders project</td>
</tr>
<tr>
<td>2013</td>
<td></td>
<td></td>
<td>10,287</td>
<td>Human rights defenders project</td>
</tr>
<tr>
<td>2013</td>
<td></td>
<td></td>
<td>213,679</td>
<td>Torture project</td>
</tr>
<tr>
<td>2013</td>
<td></td>
<td></td>
<td>160,000</td>
<td>Project to Defend human rights</td>
</tr>
<tr>
<td>2012</td>
<td></td>
<td></td>
<td>497,610</td>
<td>Human rights defenders project</td>
</tr>
<tr>
<td>2012</td>
<td></td>
<td></td>
<td>7,177</td>
<td>Torture project</td>
</tr>
<tr>
<td>2012</td>
<td></td>
<td></td>
<td>71,163</td>
<td>Project to Defend human rights</td>
</tr>
<tr>
<td>Organization</td>
<td>Year</td>
<td>Sponsoring Body</td>
<td>Amount</td>
<td>Description</td>
</tr>
<tr>
<td>--------------------</td>
<td>------</td>
<td>-----------------------</td>
<td>---------</td>
<td>-----------------------------------------------------------------------------</td>
</tr>
<tr>
<td>PCATI</td>
<td>2014</td>
<td>TIHV</td>
<td>204,753</td>
<td>Legal Activity</td>
</tr>
<tr>
<td></td>
<td>2013</td>
<td>European Commission</td>
<td>419,795</td>
<td>Training professionals in documenting torture</td>
</tr>
<tr>
<td></td>
<td>2014</td>
<td>EIDHR TIHV</td>
<td>201,632</td>
<td>Legal Activity</td>
</tr>
<tr>
<td>Parent’s Circle</td>
<td>2013</td>
<td>European Commission</td>
<td>339,520</td>
<td>Training professionals in documenting torture</td>
</tr>
<tr>
<td></td>
<td>2014</td>
<td>European Union</td>
<td>877,697</td>
<td>Bi-Annual Project to know and accept the other’s narrative, by group meetings and lectures in front of various audiences</td>
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<td>Struggle against Racism and strengthening democratic values without prejudice of nationality, religion, etc. This project involves several agencies.</td>
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