

Recommendations:
**Implementing the
IHRA Definition of
Antisemitism for
NGO Funding**



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NGO Monitor provides information and analysis, promotes accountability, and supports discussion on the reports and activities of NGOs claiming to advance human rights and humanitarian agendas.

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Photo Sources

Page 8: Poster issued by Oxfam Belgium in 2002, has since been deleted: https://www.ngo-monitor.org/reports/oxfam_belgium_produces_political_poster/

Page 9: 2010 recipient of a cash prize in an illustration contest sponsored by BADIL, has since been deleted from the Badil Website: <https://web.archive.org/web/20150104193032/http://badil.org/photo-gallery/category/226-awdaaward-caricatures-10>

Page 9: Screenshot of Human Rights Watch EU Director Lotte Leicht twitter account containing an antisemitic message, which included the tagline "'Never again' must mean NEVER AGAIN FOR ANYONE!," Source: <https://twitter.com/LotteLeicht1/status/503242645586862081>

Page 10: Screenshot of Mein Kampf being sold on Oxfam UK's on-line shop, has since been deleted: https://onlineshop.oxfam.org.uk/books/history/mein-kampf-by-adolf-hitler-hd_101394364

Page 11: Cartoons published on Palestine Monitor, a news website run by Palestinian Medical Relief Society (PMRS): <https://www.dropbox.com/s/2xqsmhcv7v1jc73/Factbook%202015.pdf>

Page 12: Screenshot of antisemitic statements made by officials of the German Society for International Cooperation (GIZ) on Facebook: <https://www.ngo-monitor.org/reports/german-government-aid-workers-spread-antisemi-tism-and-anti-israel-propaganda/>

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*For the Jewish People,
their homeland, and humanity*

Introduction

Antisemitism from non-governmental organizations (NGOs) has become an enduring feature of political discourse about Israel and Zionism – paralleling a resurgence of physical violence against Jews over the past decade.¹ Many institutions that claim to represent human rights and humanitarian values instead promulgate antisemitic rhetoric and tropes; tolerate antisemitism from executives and staff, with little to no repercussions; and consistently dismiss consideration of antisemitism as a human rights issue.

This dynamic is prevalent, characterizing the most powerful organizations such as Human Rights Watch and Amnesty International, numerous Palestinian NGOs, and other groups from around the world². At the same time, antisemitic incidents continue to be met with apathy and the absence of accountability and public debate, in particular from governments that fund these NGOs and from their supporters.

Effectively confronting this NGO antisemitism first requires building consensus on the basic elements. Of major importance is the International Holocaust Remembrance Alliance (IHRA) working definition of antisemitism.³ As discussed in detail below, the IHRA framework, which uniquely addresses both “new” and classical antisemitism, has been adopted by tens of governments and intergovernmental organizations. It has clear value as an educational resource and a yardstick for evaluating whether a particular statement or incident is marked by antisemitism, and where hatred of Jews is expressed through anti-Israel sentiment.

In NGO Monitor’s assessment, the IHRA definition can also help address the challenges posed by deeply ingrained NGO antisemitism.

NGO Monitor recommends that governments integrate the IHRA definition into funding mechanisms, alongside similar conditions already found in budgets and grant contracts (addressing discrimination, terror, hate speech), and ensure that potential grantees are aware of and bound by these requirements. Governments also need to develop rigorous procedures for vetting of potential NGO partners and/or grantees, as well as for complaints, investigations, and sanctions if concerns arise during the contract period.

We do not claim that such policies will erase the twisted hatred of Jews and Israel that inspire NGO antisemitism. However, implementation can make a major difference in pushing antisemitism further to the margins of acceptable discourse and in ensuring that governments are fighting, instead of enabling, antisemitic expression.

Recommendations

NGO Monitor recommends that governments institute clear and specific implementation mechanisms in order to maximize their commitments, as well as ensure that no resources and support are given to NGOs that engage in antisemitism.

- 1 Governments should develop guidelines and best practices across all branches and at the highest levels. Of particular importance are standards for Ministries of Foreign Affairs and/or Development Agencies responsible for allocating taxpayer funds to civil society organizations.
- 2 The IHRA definition and accompanying examples, as markers for antisemitic rhetoric and activity, should be explicitly incorporated into Calls for Proposals and Grant Agreements as grounds for disqualification from receiving funds and termination of projects. Such conditions must be made explicit, and potential grantees must be informed of their existence.
- 3 Government bodies responsible for disbursing funding should develop rigorous and thorough vetting systems to guarantee that NGOs that engage in antisemitism are disqualified. These evaluations must not be limited to technical capacity, but must consider all aspects of the potential grantees' activity, as well as any project partners.
- 4 Vetting should also occur at regular intervals throughout the duration of the grant period.
- 5 Governments should establish investigative capacities and procedures, including suspension of funding, when evidence suggests that an NGO is violating grant conditions relating to antisemitism. Such evaluations must be thorough and independent, cannot rely on NGO self-reporting, and should include mechanisms for third-party interventions in submitting complaints and information.
- 6 Governments should develop specific responses, including cancellation of contracts, when grantees breach the terms of the grant agreements. Guidelines are also required to determine conditions for determining when such NGOs become re-eligible for future grants.
- 7 The agendas of parliamentary groups on antisemitism should include examining NGO activities, based on the IHRA working definition, incorporating it into budgets and other legislation, and allotting funds for the development of educational efforts. Part of this engagement should include inter-parliamentary discussions and working groups to refine the application of the IHRA definition, including as pertains to elements deemed controversial by some.

- 8 Governments should engage with national IHRA delegations, the IHRA Permanent Office, representatives of local Jewish communities, and national and international experts on antisemitism to guide their programs and help address areas of uncertainty.
- 9 Governments should organize regular educational training sessions for the staff in relevant ministries, agencies, and diplomatic missions on practical implications of the IHRA working definition. This will ensure that professional and diplomatic staff are aware of the nature of contemporary antisemitism, able to identify it, and respond appropriately.
- 10 Although this analysis focuses on antisemitism, where NGO Monitor has more expertise, donor governments should also formalize standards, monitor activity, create benchmarks, and issue sanctions as appropriate for other forms of racism and discrimination by grantees.

IHRA Background

In response to the increase in levels of antisemitism,* many governments have recognized the importance of a consensus definition of this phenomenon.

The most widely accepted definition, adopted in May 2016, is that of the International Holocaust Remembrance Alliance (IHRA). According to IHRA, “Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities.”

Crucially, the IHRA definition includes examples of the “new” antisemitism, such as singling out and blaming the Jewish State, denying Jews a nation state and delegitimizing the existence of Israel as the Jewish State, and disguising antisemitism as the fight against the State of Israel. In this respect, the definition articulates what is and what is not antisemitism, as well as how to distinguish legitimate criticism of Israel from antisemitism.

As of October 2019, this working definition has been adopted by 34 countries including the UK, Austria, Australia, Bulgaria, Germany, Lithuania, Romania, Macedonia, US, and Canada. It has 11 observers and 7 permanent international partners, including the Claims Conference, the European Union’s Agency for Fundamental Rights (FRA), the International Tracing Service, the OSCE Office for Democratic Institutions and Human Rights (ODIHR), UNESCO, the UN, and the Council of Europe.

Some governments have gone farther than mere adoption. In January 2021, the European Commission published a “Handbook for the practical use of the IHRA Working Definition of Antisemitism,” which relates the definition “to the contexts of real-world antisemitic incidents and crimes” and illustrates “good practices in the application” of the definition. A section is devoted to how the definition can “help direct funding to civil society organisations and human rights organisations.”⁴

* [A 2020 survey by American Jewish Committee \(AJC\)](#) found that “Nearly nine out of ten American Jews (88%) believe antisemitism is a problem in the United States today and more than four out of five (82%) believe it has increased over the past five years, with a plurality (43%) saying it has increased a lot.” Likewise, according to a 2018 large-scale survey by the European Union’s Agency for Fundamental Rights, in the EU alone, “Nearly half (47 %) of all respondents worry about becoming a victim of an antisemitic verbal insult or harassment in the next 12 months, while over one third (40 %) worry about being physically attacked in that same period.”

Additionally, a number of governments have instituted funding guidelines and passed legislation that deny funds to NGOs that engage in antisemitism:

Switzerland: In June 2017, the Swiss Parliament adopted a resolution to “amend the laws, ordinances and regulations so that Switzerland can no longer subsidize, even indirectly, development cooperation projects carried out by NGOs involved in racism or incitement.”⁵

Denmark: On October 5, 2018, the Danish Foreign Ministry announced new criteria for its funding of NGOs. These guidelines specifically state that projects that promote BDS, organizations that question Israel’s right to exist, and those with ties to terror will not be eligible to receive funds.⁶

France: On February 25, 2020, in response to a parliamentary question, the French Prime Minister’s Office declared that government funding to NGOs will be guided by the IHRA definition of antisemitism.⁷

The Netherlands: According to the Dutch MFA’s “2018 Work Plan,” contracts signed between the Dutch MFA and NGOs include funding guidelines that ensure the Netherlands does not finance “organizations that promote hate-speech, racism, [or] antisemitism in any sort or format” (NGO Monitor translation).⁸

Germany: On May 17, 2019, the German Bundestag passed a landmark resolution defining BDS (boycott, divestment, and sanctions) campaigns against Israel as antisemitic. The joint resolution, “Stand Resolutely Against the BDS Movement: Combat Antisemitism,” was supported by the CDU/CSU (The Union), SPD (Social Democratic Party), FDP (Free Democratic Party), and Green parties. The Bundestag called for ending German government funding to groups that promote BDS. The resolution states that Germany will:

- “Combat every form of antisemitism, from the beginning and in all consequence and to condemn the BDS campaign and their call for a boycott of Israeli goods, businesses and of Israeli scientists, artists or athletes;
- Not provide premises and facilities under public administration to organizations that express anti-Semitism or call Israel’s right to exist into question. The Bundestag calls on the Federal Government not to support events of the BDS movement or groups actively pursuing their goals;
- Expresses its support of the Federal Government and the Commissioner for Jewish Living in Germany in their efforts to fight against anti-Semitism and any extremism;
- Not financially support organizations that question Israel’s right to exist;
- Not financially support any projects that call for a boycott of Israel or actively

a series of proposals and statements referring to “the Israeli apartheid state and its perpetration of racist crimes against humanity including ethnic cleansing, acts of genocide.”¹²

From early on, rather than rejecting this trend in civil society, the most prominent human rights NGOs have been central contributors to it. For instance, in 2002, Oxfam Belgium produced a poster of an “Israeli orange” dripping with blood to promote anti-Israel boycotts. The caption read: “Israeli fruits have a bitter taste...reject the occupation of Palestine, don’t buy Israeli fruits and vegetables.”¹³

At times, this NGO antisemitism has taken on religious tones. In 2009, a group of thirteen Palestinian Christian clergy drafted the “Kairos Palestine Document” to rally churches to support anti-Israel BDS, delegitimization, and demonization campaigns.¹⁴ The Central Conference of American Rabbis explains that the Document “echoes supersessionist language of the Christian past, since rejected by most mainstream Christian denominations, referring to the Torah absent Christian revelation as, in the words of the Christian Scriptures, ‘a dead letter.’”¹⁴ The Simon Wiesenthal Center describes it as “a revisionist Document of hatred for Israel and contempt of Jews.”¹⁵



NGO antisemitism can also contain classical antisemitic themes. In 2010, Palestinian NGO “BADIL” awarded a prize in 2010 to a caricature of a Jewish man, garbed in traditional Hasidic attire, with a hooked nose and side locks. He stands on top of a box adorned with Jewish stars crushing to death a child, holding keys labeled “US” and “UK” and a pitchfork stylized as a menorah dripping with blood, while skulls litter the ground.¹⁶

Unfortunately, NGO antisemitism is not a relic of the first decade of the new millennium, and has continued unabated since.

During the August 2014 Gaza conflict, senior officials from Human Rights Watch,

** Following protest initiated by NGO Monitor over the blood libel overtones, Oxfam withdrew the campaign.

*** The Kairos Palestine Document also drew criticism for rationalizing, justifying, and trivializing terrorism.

including Executive Director Ken Roth, promoted a highly propagandistic advertisement (produced by another NGO) in *The New York Times* and *The Guardian* equating “Nazi genocide” with “the massacre of Palestinians in Gaza.” They disseminated an antisemitic message, which included the tagline “‘Never again’ must mean NEVER AGAIN FOR ANYONE!”¹⁷



In January 2019, Amnesty published a report on “The Tourism Industry and Israeli Settlements.” This publication denies Jewish connections to historical sites in Israel and the West Bank, and faults Israel for preserving Jewish historical and cultural heritage, as well as places that are holy to Christians.¹⁸

For its part, antisemitism has manifest on Oxfam Great Britain’s online store. In March 2020, Oxfam was forced to apologize for selling copies of the infamous antisemitic hoax text, *The Protocols of the Elders of Zion*.¹⁹ Later in 2020, NGO Monitor researchers found multiple copies of Adolf Hitler’s *Mein Kampf*, including some featuring swastikas on the cover, having been listed for sale on Oxfam’s website.²⁰

In another example involving large international NGOs, a trustee of Islamic Relief Worldwide (IRW) resigned²¹ in July 2020 after calling Jews the “grandchildren of monkeys and pigs” and Egypt’s president a “Zionist pimp.” One month later, IRW’s entire board resigned in the wake of the chair describing Israel as the “Zionist enemy”

**** In this context, it is worth noting that at Amnesty International-UK’s 2015 annual conference, the NGO adopted 16 of 17 motions. The only proposed resolution that was rejected called for the organization to take steps to address rising antisemitism in the UK.

Additionally, Kristyan Benedict, Campaign Manager for Amnesty-UK, has a strong anti-Israel obsession, fueled by global conspiracy theories. On November 19, 2012, during a different armed conflict in Gaza, he tweeted: “Louise Ellman, Robert Halfon & Luciana Berger walk into a bar...each orders a round of B52s (inspired by @KarlrMarks Bar quips) #Gaza.” The three people he characterized as war-mongers were British Members of Parliament, all of whom are Jewish. Rather than take decisive action, Amnesty-UK buried their heads in the sand, “the tweet in question was ill-advised and had the potential to be offensive and inflammatory but was not racist or antisemitic.”

and praising Hamas as “great men’ who were answering the ‘divine and holy call of the Muslim Brotherhood.”²²

International NGOs are not the sole proprietors of antisemitism. In fact, a diverse group of NGOs from around the world engage in Arab-Israeli-conflict-related antisemitism. Examples include:

- Palestine Monitor, a news website run by Palestinian Medical Relief Society (PMRS), publishes lengthy “Factbooks.” Its 2015 “Factbook” features obscene antisemitic cartoons that trivialize the Holocaust.²³



- In June 2017, Jewish Voice for Peace (JVP) blamed AIPAC, ADL, Birthright, and other American Jewish organizations and programs for police violence against minorities in America. A video created for this campaign, but subsequently removed, graphically represented the American Jewish organizations in what appeared to be a spider web and urged viewers to “Hold accountable the Jewish institutions who run and fund the deadly exchange.”²⁴
- The radical, pro-BDS Jewish French Union for Peace (UJFP) received funding from the French government (Commissariat général à l’égalité des territoires (CGET)) for a project to combat racism. Abusing its government funds, UJFP published a book demonizing Israel and making false accusations against Israel and France. It also produced video clips that compare Zionism to Nazism and alleged that Zionism is antisemitic. After parliamentarians, Jewish organizations, and journalists intervened,²⁵ the French government asked that its logo be removed from the UJFP website, halted the grant, and demanded the return of already disbursed funding in February 2018.²⁶



« Antisémitisme et antisionisme - Clip 7/10 de 'Paroles juives contre le racisme' », October 3, 2017: <https://www.youtube.com/watch?v=VbJKdwOalx8>



« Israël et les juifs - Clip 8/10 de 'Paroles juives contre le racisme' », October 5, 2017: <https://www.youtube.com/watch?v=GRC-EbMKe8E>

- In 2018, NGO Monitor identified virulently antisemitic statements made by officials of the German Society for International Cooperation (GIZ) – a German government-owned agency that implements Germany’s humanitarian and development aid around the world. These statements included comparisons between Israel and the Nazis, blaming the downfall of Arab leaders on a “Hebrew spring,” and depicting Israel as a two-headed monster.²⁷
- In multiple periodic reports produced by Applied Research Institute Jerusalem (ARIJ) in 2014-2019, the NGO uses the term “Talmudic rituals” to refer nefariously to Jewish worship at holy sites.²⁸
- The COVID-19 pandemic has been yet another trigger for antisemitic discourse from NGOs, perpetuating the classically antisemitic trope that Jews spread disease. In May 2020, the Spanish Al Quds Association alleged, “there is a people that has suffered for more than a century an epidemic of a virus that is spreading without pause throughout all of historic Palestine, an epidemic whose objective is to eliminate it from the face of its earth. This virus is called Zionism, and like other viruses it first prevents the normal development of life and finally exterminates. Like all viruses it knows no borders, it is not limited to one part or another. Its vocation is to spread and it is incompatible with life. At the core of the Zionist project lives racism, discrimination and ultimately the genocidal vocation.”²⁹



Appendix I: IHRA Working Definition of Antisemitism

Taken from the International Holocaust Remembrance Alliance website³⁰ (emphasis in original):

“Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities.”

To guide IHRA in its work, the following examples may serve as illustrations:

Manifestations might include the targeting of the state of Israel, conceived as a Jewish collectivity. However, criticism of Israel similar to that leveled against any other country cannot be regarded as antisemitic. Antisemitism frequently charges Jews with conspiring to harm humanity, and it is often used to blame Jews for “why things go wrong.” It is expressed in speech, writing, visual forms and action, and employs sinister stereotypes and negative character traits.

Contemporary examples of antisemitism in public life, the media, schools, the workplace, and in the religious sphere could, taking into account the overall context, include, but are not limited to:

- Calling for, aiding, or justifying the killing or harming of Jews in the name of a radical ideology or an extremist view of religion.
- Making mendacious, dehumanizing, demonizing, or stereotypical allegations about Jews as such or the power of Jews as collective — such as, especially but not exclusively, the myth about a world Jewish conspiracy or of Jews controlling the media, economy, government or other societal institutions.
- Accusing Jews as a people of being responsible for real or imagined wrongdoing committed by a single Jewish person or group, or even for acts committed by non-Jews.
- Denying the fact, scope, mechanisms (e.g. gas chambers) or intentionality of the genocide of the Jewish people at the hands of National Socialist Germany and its supporters and accomplices during World War II (the Holocaust).

- Accusing the Jews as a people, or Israel as a state, of inventing or exaggerating the Holocaust.
- Accusing Jewish citizens of being more loyal to Israel, or to the alleged priorities of Jews worldwide, than to the interests of their own nations.
- Denying the Jewish people their right to self-determination, e.g., by claiming that the existence of a State of Israel is a racist endeavor.
- Applying double standards by requiring of it a behavior not expected or demanded of any other democratic nation.
- Using the symbols and images associated with classic antisemitism (e.g., claims of Jews killing Jesus or blood libel) to characterize Israel or Israelis.
- Drawing comparisons of contemporary Israeli policy to that of the Nazis.
- Holding Jews collectively responsible for actions of the state of Israel.

Antisemitic acts are criminal when they are so defined by law (for example, denial of the Holocaust or distribution of antisemitic materials in some countries).

Criminal acts are antisemitic when the targets of attacks, whether they are people or property – such as buildings, schools, places of worship and cemeteries – are selected because they are, or are perceived to be, Jewish or linked to Jews.

Antisemitic discrimination is the denial to Jews of opportunities or services available to others and is illegal in many countries.

Endnotes

1. See, for instance, the Anti-Defamation League's Audit of Antisemitic Incidents 2019: <https://www.adl.org/audit2019>
2. For detailed information on these organizations, see NGO Monitor's website: <https://www.ngo-monitor.org/>
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