



Potential Abuse of German Development Resources by Terror Affiliated Palestinian NGOs

The Case of the Popular Front for the Liberation of Palestine

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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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Executive Summary

Development and cooperation aid is seen as one of the most effective strategies for promoting democracy and fundamental rights, as well as building sustainable and inclusive societies, particularly in places where these processes are in their initial phases. To be sure, the path to building a democratic society is a political process, traversing existing ideological and social rifts, and subject to passionate debates between different political camps.

Especially in conflict ridden areas, politicization can result in development aid lending a platform to radical voices and amplifying inflammatory, hateful narratives. Such aid is particularly susceptible to abuse by groups that promote radical political narratives. This is even more pronounced in the Palestinian-controlled areas, including Gaza, where many of the political factions are designated as terror groups by Europe (Hamas, Islamic Jihad, Popular Front for the Liberation of Palestine [PFLP]).

This paper provides a case study that examines the ways that political actors propagate and legitimize radicalized narratives – namely, local Palestinian civil society organizations affiliated with the PFLP terror group, which receive European and more specifically German development aid.

The PFLP is multifaceted, consisting of overlapping functions including militant operations, local partisan political activity, and international advocacy via a "human rights" NGO network. These aspects are complementary, all contributing to the broadening of the PFLP's sphere of influence and to achieving its goals.

The overlapping character of PFLP activities was illustrated acutely when several senior NGO employees (including those in financial leadership positions) were arrested for a PFLP terror attack in 2019, in which Rina Shnerb, a 17-year-old Israeli, was murdered. A subsequent investigation run by the Israeli Ministry of Defense (MoD) concluded that six PFLP-affiliated NGOs had diverted public funds. Ultimately, all six were designated as terror entities.

Information showing the affiliation of the senior NGO officials to the PFLP terror group was already publicly available years before the attack – convictions or jail time for terror related offenses, public endorsement and glorification of the PFLP, simultaneously holding positions at the PFLP and the NGOs in question. Despite this, development agencies in Europe did not recognize an imminent threat in engaging with these NGOs and the PFLP-affiliated officials.

Furthermore, even after the terror attack, the local EU representative in Ramallah, Sven Kühn von Burgsdorff sent a "<u>clarification letter regarding the EU-funded contracts</u>" to the Palestinian NGO network, in which he wrote that "it is understood that a natural person



affiliated to, sympathizing with, or supporting any of the groups or entities mentioned in the EU restrictive lists is not excluded from benefiting from EU-funded activities, unless his/her exact name and surname (confirming his/her identity) corresponds to any of the natural persons on the EU restrictive lists."

In light of the NGO involvement in the lethal terror attack, this statement sparked strong protests by elected Members of the European Parliament. After months of public debate, an additional clarification statement was issued by Ursula von der Leyen, President of the European Commission, <u>declaring</u> that EU vetting rules "make the participation of entities, individuals or groups of individuals affiliated, linked, or supporting terrorist organizations incompatible with any EU funding."

The two statements made by these European Commission officials were diametrically opposed to one another, showing the challenge that the EU faces in addressing softer forms of the terror threat in the context of development aid and civil society.

Clearly, this situation, in which development aid is provided in a context where terror organizations operate as political actors, leaves a regulatory vacuum that can enable abuse of development programs and funds by terror affiliated political actors, including diversion of public funds to terror related activities.

The existing contracts between the EU and NGO grantees, even after the 2019 terror attack, only reference the EU terror list, which includes Palestinian entities like Hamas, Islamic Jihad, and PFLP, but does not include any persons or organizations connected or identified with them. Even the Israeli government decision to designate the NGOs in question did not lead to stronger regulatory mechanisms.

This paper argues that the nature of the relationships between civil society actors and violent extremist movements necessitates pinpoint tools for identifying potential abuse in development aid. There is a need to recalibrate the mechanisms used to strike this balance.

The key to addressing this inherent difficulty is to develop capacity that would better identify non-traditional extremist and radicalization agents that are affiliated with designated terror groups even if they do not necessarily participate in physical violence. Such vetting should not rely solely on classified information available only to intelligence and security services, but rather should build on readily available data collection methods.

In this respect, our research indicated that, irrespective of the Israeli decision to designate six NGOs as terror entities, the publicly available evidence of **affiliation between these NGOs and the PFLP** should have been sufficient to disqualify them as partners in any development project. Evidence of this affiliation, taken solely from publicly available



sources, appears in Annex "The Links between the PFLP and the European Government-funded NGO Network."

This paper also discusses the challenge that development frameworks face of how to improve transparency and anti-terror regulations in order to counter unintentional funding of terrorist-affiliated NGOs, while at the same time not restricting the operations of genuine human rights organizations.

While the need to introduce such improvements is relevant across Europe, this paper will focus on the German context. The report offers a set of practical recommendations aimed at assisting policy makers in expanding and implementing existing anti-terror regulations, so that more robust vetting can be introduced in the context of development aid. We argue that von der Leyen's statement, which highlighted the importance of considering whether groups and individuals are "affiliated" with the designated terror entities, best addresses the missing specificity in the EU contracts with NGOs.



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1. PFLP Terror Group and its NGO Activity

1.1. Historical Background

Founded in 1967, the Popular Front for the Liberation of Palestine (PFLP) is a secular Palestinian Marxist-Leninist organization, originally supported by the former Soviet Union and China. The PFLP is a terrorist organization, designated as such by the <u>EU</u>, the <u>US</u>, <u>Canada</u>, and <u>Israel</u>. The group is part of the PLO, but <u>has never recognized the State of Israel</u>, <u>opposes all negotiations</u>, promoting instead the "liberation" of all of "historical Palestine". It has regularly employed terror methods targeting civilians, including <u>suicide bombings</u>, <u>shootings</u>, and <u>assassinations</u>, and was the first Palestinian organization to hijack airplanes in the 1960s and 1970s.

The group was responsible for the assassination of Israeli Minister of Tourism Rechavam Ze'evi in 2001, and its members colluded with the Baader-Meinhof Gang (a West German radical group), in the hijacking of an Air France Tel Aviv-bound flight in 1976, diverting it to Entebbe, Uganda. PFLP members claimed responsibility for the house invasion and murder of the Fogel family in 2011, and were responsible for the synagogue massacre in the Har Nof neighborhood of Jerusalem in 2014, where four worshipers and an Israeli Druze police officer were murdered. The terror organization also praised its "comrades" for murdering Israeli Border Police office Hadas Malka, and wounding four other Israelis in an attack which took place on June 16 2017, in Jerusalem. In August 2019, a PFLP terror cell carried out a bombing against Israeli civilians, murdering 17-year-old Rina Shnerb, and injuring her father and brother.

1.2. PFLP NGO Network

As with other terror entities such as Hamas and Hezbollah, the PFLP is multifaceted, consisting of overlapping functions including militant operations, local partisan political activity, and international advocacy via a "human rights" NGO network. These aspects are complementary, all contributing to the broadening of the PFLP's sphere of influence and achieving its goals. However, due to its secular orientation, for more than 20 years, the PFLP has been able to engage with European officials and enjoy development funds by operating under the façade of civil society. PFLP NGOs have served as the main implementing partners on projects geared toward democracy and capacity building, human rights, and humanitarian causes.

Over the decades, but particularly following the Oslo agreements, the PFLP activists <u>created</u> separate NGOs to address each "human rights issue," ranging from women's rights, to access to basic medical services, food security, and more.

As a result, this terror-affiliated NGO network gained immense credibility, or a "halo," particularly because it succeeded in associating its activities with the most critical



democratic processed to determine sustainability of a future independent Palestinian state.

NGO Monitor has identified 13 NGOs members of this PFLP network, which, since 2008, received more than €200 million combined in development aid from European governments, including Germany.

Our research also found over 70 staff and board members, as well as other officials, who held positions in both this NGO network and the PFLP. The evidence tying these NGOs and their leadership to the PFLP includes statements from the PFLP acknowledging NGO officials as members, the alleged involvement of NGO officials in a string of terrorist attacks, indictments and convictions of NGO officials on terror-related charges, and participation in and support for PFLP activities (for more information, see annex *The Links between the PFLP and the European Government-funded NGO Network.*").

2. Israel Designation of 8 European-Funded Palestinian NGOs as Terror Organizations and EU and EU Member States Response

In October 2021, the Israeli Ministry of Defense (MoD) designated six Palestinian NGOs as terror organizations. According to the MoD, Defense for Children International-Palestine (DCI-P), Union of Agricultural Work Committees (UAWC), Al-Haq, Addameer, Union of Palestinian Women's Committees (UPWC), and Bisan Center for Research and Development (Bisan) are operated by and for the benefit of the PFLP. Two additional PFLP-linked organizations – Health Workers Committee (HWC) and Samidoun Palestinian Prisoner Solidarity Network (Samidoun) – were designated, respectively, in January 2020 and February 2021.

In May 2021, the <u>Israeli government</u> determined that these NGOs had diverted humanitarian aid funds from European donors to the PFLP and recruited members into the terror group. Furthermore, <u>a security official told Israel's N12 news site</u> on October 23, 2021 that these NGOs provided a funding "lifeline" for the PFLP, employed PFLP terrorists, and that PFLP terror operatives used NGO offices for meetings.

The MoD's investigation was triggered by the August 2019 terror attack in which Rina Shnerb, a 17-year-old Israeli teen, was murdered. A few months later, several of these NGOs' senior employees were arrested and accused of planning and carrying out the attack. They are currently standing trial:



- UAWC <u>financial director</u> Samer Arbid is currently on trial for <u>commanding the PFLP terror cell that carried out the murder of Rina Shnerb</u>. According to the indictment against him, Arbid prepared and detonated the explosive device. In August 2020, the PFLP published a <u>statement</u> referring to Arbid as a "prisoner and commander" and "one of the heroes of the Bubeen operation," referring to the August 2019 bombing.
- UAWC's <u>Finance and Administration Director</u> Abdul Razeq Farraj was arrested by Israeli forces on October 23, 2019. According to his indictment, <u>he authorized the</u> <u>August 2019 bombing</u>. According to Addameer and Amnesty International, Farraj spent <u>1985-1991</u> in "<u>an Israeli prison after being convicted of affiliation with the</u> <u>Popular Front for the Liberation of Palestine</u>."
- HWC's finance and administration manager Walid Hanatsheh (Abu Ras) was arrested in October 2019 for being the alleged leader of the PFLP's "military" operations and commanding Samer Arbid, the terrorist responsible for leading the PFLP terror cell that carried out the August 2019 bombing. According to an Israeli media report, Hanatsheh bankrolled the attack. Following his arrest, the PFLP labeled Hanatsheh a "leader in the Popular Front." Prior to this, he was arrested several times in 2002-2012 by Israeli security forces.

As these groups were largely funded by the EU and European governments, the Israeli decision led to strong reactions from European officials. Some indicated a desire to tighten vetting procedures to ensure that taxpayer funds are not diverted by terror-linked actors, while others rejected and publicly challenged the designations.

2.1. Response by the European Commission, the Netherlands, and Germany

The involvement of PFLP-affiliated NGOs in a lethal terror attack, followed by the Israeli designations, precipitated policy developments across Europe:

- In May 2020, the EU launched an <u>internal investigation</u> into allegations that EU funds went to terror-linked or -supporting NGOs. As of November 2022, the investigation remains pending.
- In June 2020, European Commission High Representative Vice President (HRVP) Josep Borrell, in <u>response</u> to a <u>letter co-signed</u> by several MEPs, stated, "these rules make the participation of entities, individuals or groups affiliated, linked or supporting terrorist organisations incompatible with any EU funding." The European Commission President's office further <u>elaborated</u> that "If there is clear evidence that any organization has made an inappropriate use of EU funds, the European Commission will take the appropriate measures such as recovery of the funds, exclusion of the entity from future EU financing, prosecution, etc".
- In January 2022, the Netherlands <u>ended</u> its €13 million contract with the Union of Agricultural Work Committees (UAWC), one of the PFLP-linked designated NGOs.
 In a letter to the Dutch parliament, Development Cooperation Minister Tom de Bruijn and Foreign Affairs Minister Ben Knapen wrote that an independent



investigation commissioned by the government in 2021 found, based on open-source, verifiable information, that 34 UAWC employees had ties to the PFLP in 2007-2020, some holding leadership positions in the terrorist group concurrent to their employment at UAWC. The ministers added that "the large number of board members of UAWC with a dual mandate is particularly worrying." In addition, on January 31, 2022, the Dutch representative to the UN in Geneva highlighted in an <u>official letter</u> that: "The strong findings about individual-level ties between the UAWC and the PFLP, and the UAWC's lack of candour about the situation before or during the review, constitute serious concern and sufficient reason in the Government's view to terminate its funding to the UAWC's activities."

- In February 2022, during a visit of German Foreign Minister Annalena Baerbock to Israel, Israeli media <u>reported</u> that "the German and Israeli foreign ministries will jointly consider ways to continue funding projects in the territories without the money going to six Palestinian organizations that Israel outlawed as terrorist groups."
- In May 2022, the European Parliament approved the 2020 discharge report, "<u>EU General Budget Commission and Executive Agencies</u>," one of the EU's most important budgetary documents. The document clearly calls on the Commission to "thoroughly verify the use of Union funds by third entities, their affiliates, and/or natural persons to ensure that no funds are allocated or linked to any cause or form of terrorism and/or religious and political radicalisation; make sure that individuals or groups affiliated, linked to or supporting terrorist organizations are excluded from Union funding; ensure that those Union funds are proactively recovered, and that the recipients involved are excluded from future Union funding".

In stark contrast, on July 12, 2022, nine EU member States, including Germany and the Netherlands, issued a <u>statement</u> rejecting Israel's designation of the six Palestinian NGOs, stating that "accusations of terrorism or links to terrorist groups must always be treated with the utmost seriousness. The designations needed therefore to be assessed carefully and extensively. No substantial information was received from Israel that would justify reviewing our policy towards the six Palestinian NGOs on the basis of the Israeli decision to designate these NGOs as 'terrorist organizations'."

The apparent dichotomy between the policies and statements adopted by the EU and other member states illustrates the inherent difficulty in developing capacity for aid structures that would better identify non-traditional extremist and radicalization agents that are affiliated with designated terror groups but do not necessarily participate in physical violence.



3. German Federal Funding for Palestinian PFLP-linked NGOs and the Lack of Transparency

Germany is a global leader in providing development aid (referred to as "cooperation" in Germany) and was the second largest bilateral donor in 2021 (after the US), allocating \$32.2 billion to official development assistance. Yet, the country's development aid system lacks even basic transparency and is highly decentralized. The Ministry for Economic Cooperation [BMZ] lists 34 groups involved in Germany's development cooperation policy, including NGOs, political foundations, and church aid organizations, making it nearly impossible to follow the flow of taxpayer money (see NGO Monitor's report "Deutsche Entwicklungszusammenarbeit: Die Notwendigkeit nach Transparenz und Rechenschaftspflicht bei der Förderung von Nichtregierungsorganisationen".)

Despite this lack of transparency and based on available data, NGO Monitor's researchers documented German government allocations of significant funds for projects involving at least 10 out of 13 PFLP-linked NGOs identified to date, including 5 recently designated by the Israeli MoD. Senior officials from these German-funded NGOs were arrested following Rina Shnerb's murder in August 2019, and have been convicted for their direct involvement in the bombing or for their membership in the PFLP.

In addition to the selected below examples of direct German funding for designated and PFLP-linked NGOs, in 2019-2021, Germany allocated \$39 million (out of \$85 million, 45% in total) to the United Nations Office for the Coordination of Humanitarian Affairs (UN-OCHA) oPt Humanitarian Fund. During those years, the fund allocated €5.9 million to several designated and PFLP-linked NGOs.

Examples of German Funding for Israeli-designated PFLP-linked NGOs

Union of Agricultural Work Committees (UAWC)

- In <u>2018</u>, <u>2019</u>, <u>2020</u>, and <u>2021</u>(latest available data), Medico International (MI) listed joint projects with the UAWC.
 - In 2021, MI spent €1.8 million, including with the "support of AA [German Federal Foreign Office], BMZ [Germany's Federal Ministry for Economic Cooperation and Development], and stiftung m.i.," for its numerous projects in "Israel/Palestine."
- In 2015-2019, BMZ provided GIZ with <u>€9.3 million</u> for the "<u>Support of Technical and Vocational Education and Training (TVET) and Employment Programme.</u>"
 UAWC (see <u>here</u> and <u>here</u>) states that it was an implementing partner for the project.
- According to the <u>response</u> to a May 2021 Bundestag question, the Rosa Luxemburg Foundation partnered with UAWC in implementing "training and analysis in the areas of food sovereignty and labor rights."



DCI-P and Al-Hag

- In 2021-2024, BMZ funded the German NGO Weltfriedensdienst and implemented a project, "Side by side: strengthening civil society forces," with Al-Haq and DCI-P.
- In January 2022, DCI-P published a <u>video clip</u> accusing "Israeli forces and settlers" of "regularly target[ing] Palestinian children on their way to and from school." The video clip bears the logo of DCI-P, Save the Children, and German Cooperation (unclear if it's BMZ or GIZ). In 2018-2021, Save the Children Germany, using an unknown amount provided by BMZ, implemented <u>a project</u> in the West Bank and Gaza.
- In <u>2021</u>, Medico International listed a project implemented by Al-Haq.

Bisan

 Bisan's funding sources and amounts are unknown. However, in 2020 and 2021, jointly with Friedrich-Ebert Stiftung, Bisan <u>published</u> The Progressive Journal.

Health Work Committees (HWC)

- In 2018, Health Work Committees (HWC) hosted and organized workshops for its employees in the West Bank and Jordan on "Jobbying and advocacy mechanisms and their application." The workshops were funded by GIZ, the "German International Cooperation."
- In 2016, HWC "<u>completed a specialized training course on integrating mental health in primary health care for workers</u>," which was carried out together with the Palestinian Medical Education Initiative (PMEI) and funded by GIZ/ GIZ's 2009-2022 <u>Open Regional Fund for the MENA region</u>.

Examples of German Funding for Other PFLP-linked NGOs

Union of Health Workers Committees (UHWC)

UHWC is identified by Fatah as an official PFLP "affiliate" and by a 1993 USAID-engaged audit as "the PFLP's health organization." (For more information on UHWC's PFLP ties, read NGO Monitor's report "Union of Health Work Committees' Ties to the PFLP Terror Group.") The exact relationship between UHWC and HWC (see introduction above) is unclear, but the two have been described as "sister organization[s]."

In December 2021, in the framework of the BMZ-funded "mental health integration project" (amount unknown), the Union of Health Workers Committees (UHWC) and Médecins du Monde France held a joint training session.



Palestinian Centre for Human Rights

Multiple PCHR officials have ties to the PFLP, including its General Director, Raji Sourani, who was <u>publicly honored by the PFLP in 2014</u>. (For more information, read NGO Monitor's report titled the "<u>Palestinian Centre for Human Right's Links to the PFLP Terror Group</u>".)

• In 2017, BMZ provided <u>€346,000</u> to PCHR.

Al Mezan

A number of <u>Al Mezan</u> officials and employees have links to the PFLP. Additionally, Al-Mezan officials and board members speak at PFLP events, and many have posted material on their social media accounts promoting terror groups or utilizing antisemitic imagery and rhetoric. (For more information on Al Mezan's PFLP ties, read NGO Monitor's report called "<u>Al Mezan Center For Human Rights' Ties to the PFLP Terror Group</u>.")

• In <u>2018</u>, <u>2019</u>, <u>2020</u>, and <u>2021</u> (latest available data), Medico International provided significant funding amounts to Al Mezan.

Abdel Shafi Community Health Association (ACHA) (formerly Red Crescent Society for the Gaza Strip (RCS4GS))

ACHA was founded and is directed by senior members of the PFLP. Several ACH employees have demonstrated support for Palestinian terror groups and their actions. On <u>multiple occasions</u>, <u>ACHA facilities</u>, were <u>used</u> by the <u>PFLP</u> to hold their <u>formal events</u>.

• In December 2019, RCS4GS reported that it had <u>signed a contract</u> with the United Nations Development Programme (UNDP) for the construction of an additional floor of RCS4GS' Community and Health Center for Women. The project is funded by the "Federal Republic of Germany" through the German development bank, KFW. The project's funding amount is unknown. In 2019-2022, according to the International Aid Transparency Initiative (IATI), BMZ is providing UNDP with €13 million for the project "<u>Employment Program Poverty-oriented Infrastructure, EGP XI</u>" in Gaza, the West Bank, and East Jerusalem.

Palestinian NGO Network (PNGO)

Palestinian NGO Network (PNGO), an umbrella organization, defends the legitimacy of Palestinian "resistance," and opposes normalization with Israel and Israelis. Several PNGO members have been designated for their PFLP links, and two PNGO board members are currently standing trial for terror-related offenses.

Walid Hanatsheh (Abu Ras) – <u>Member of the board of directors</u> of PNGO, and <u>finance and administration manager</u> at the <u>designated</u> PFLP-linked Health Work Committees (HWC). Hanatsheh was <u>arrested</u> in October 2019 and is on trial for allegedly <u>leading PFLP terror operations</u>. In this capacity, he is accused of being



- involved in an August 2019 terror attack in which Rina Shnerb, a 17-year-old Israeli, was murdered. According to an Israeli media report, Hanatsheh <u>financed</u> the August bombing.
- Shatah Odeh Chair of the PNGO Board of Directors (until her arrest in July 2021) and "General Director" of the designated PFLP-linked HWC. Odeh was arrested, along with five additional HWC officials, for "using fraud and deception in many European countries in order to receive large-scale financing worth millions of Euros" that was allegedly diverted to the PFLP. In May 2022, Odeh was convicted and accepted a plea bargain, pleading guilty to crimes including holding a position in a banned organization, presence in the proceedings of a banned organization, and improperly transferring funds [into the West Bank] for her role in raising funds for the organization after it was declared a terrorist entity by the IDF in January 2020.

Additionally, on multiple occasions, PNGO officials have rejected the EU's anti-terrorism requirements regarding NGO funding, and reportedly "refused [in 2019] to sign an EU grant request that stipulates among its criteria that beneficiaries must refuse to transfer any EU aid given to terrorist groups or entities." Notably, Shawan Jabarin, executive director of the designated NGO Al-Haq declared: "We demanded to include conditions stipulating that we do not have to recognize the criteria listed regarding terror groups." In a 2020 publication, PNGO declared that it "will continue to work with all parties... to develop or change the European Union's position on the [anti-terror] conditions, on the ground of dialogue and serious work in Palestine and European capitals."

 As reported in a Bild <u>exposé</u>, GIZ acknowledged that in 2014-16, it provided €70,000 to the Palestinian NGO Network (PNGO). According to GIZ, Germany funds PNGO "so that this network of Palestinian NGOs can better coordinate its activities."

In addition, GIZ supports "training for the member organizations of PNGO, in which they learn to better address and represent the interests of young people." On the GIZ website, this project is titled "<u>Strengthening Palestinian civil society</u>" and was extended until 2023.

4. Insufficient Vetting Procedures and Safeguards in Germany and the EU Addressing the Risks of Affiliations with a Terrorist Entity

In recent years, there has been greater awareness regarding the need for donor governments to closely define their funding goals with NGOs, most particularly in the context of the Israeli-Palestinian conflict. The European Union and several European governments introduced new NGO funding policies or amended existing ones to address



reports that indicated insufficient transparency, and evidence that some NGOs are linked to terror and/or promote antisemitism and other types of hatred.¹

For instance, in 2019, the European Union introduced <u>a new anti-terror clause in its</u> <u>contracts with all NGOs</u> (see 1.5 bis of ANNEX II "General conditions applicable to European Union-financed grant contracts for external actions"), stating that "Grant beneficiaries and contractors must ensure that there is no detection of subcontractors, natural persons, including participants to workshops and/or trainings and recipients of financial support to third parties, in the lists of EU restrictive measures."

Similar terms are used in the German Society for International Cooperation (GIZ)'s "General terms and conditions of contract ('Terms and Conditions') for supplying services and work on behalf of the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH." Indeed, as stated: "In executing the contract, the contractor shall also comply with embargoes or other trade restrictions imposed by the United Nations, the EU or the Federal Republic of Germany. The contractor shall notify GIZ without delay and of

https://www.eca.europa.eu/Lists/ECADocuments/SR18_35/SR_NGO_FUNDING_EN.pdf

On October 5, 2021, the European Commission published its <u>"EU Strategy on Combating Antisemitism and Fostering Jewish Life (2021-2030)</u>," which states that the Commission and the High Representative will: "Ensure that EU external funds, in compliance with existing measures, may not be misallocated to activities that incite hatred and violence, including against Jews;" and "Incorporate the fight against antisemitism into all their human rights strategies and policies, taking into account the IHRA definition of antisemitism." This follows a January 2021 report, "<u>Handbook for the practical use of the IHRA Working Definition of Antisemitism</u>," published jointly by the European Commission with the International Holocaust Remembrance Alliance that urged funding institutions to "reference the IHRA Working Definition of Antisemitism to support control and supervision.

https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combatting-discrimination/racism-and-xeno phobia/combating-antisemitism/eu-strategy-combating-antisemitism-and-fostering-jewish-life-2021-2030_en

https://op.europa.eu/en/publication-detail/-/publication/d3006107-519b-11eb-b59f-01aa75ed71a1/language -en

In December 2017, the European Commission released its "Implementing Decision" on the "Annual Action Programme 2017 in favour of Palestine to be financed from the general budget of the Union" that includes a significant policy change in taking responsibility for the organizations it supports. It stipulates that: "Particular attention will however be paid to prevent that EU-supported civil society organisations are also engaged in activities inciting to hatred and/or violence. Eligibility conditions of the calls for proposals to be launched under this action will include strict compliance with the EU Framework Decision on racism and xenophobia."

https://www.europarl.europa.eu/doceo/document/E-9-2020-000425-ASW_EN.html

¹ In 2017, the European Parliament commissioned the European Court of Auditors (ECA) to "assess the transparency of EU funds contracted with NGOs." The report, titled "<u>Transparency of EU funds implemented by NGOs: more efforts needed,</u>" concluded that there was neither sufficient transparency nor information regarding the implementation of EU funds by NGOs.



its own volition if the contractor, a member of its official managing body and/or other administrative bodies, its shareholders and/or its employees should be placed on a sanctions list published by the United Nations or the EU. The same stipulation applies if the contractor should learn of an event that results in the inclusion of aforementioned individuals on such a list."

In practice however, these anti-terror requirements are not efficient in the context of EU and German funding to Palestinian NGOs. Indeed, although the consolidated list of persons, groups and entities subject to EU financial sanctions includes Palestinian terror groups, including Hamas, Izzedine al-Qassam Brigades, Al-Aqsa Martyrs Brigade, Islamic Jihad, and the Popular Front for the Liberation of Palestine (PFLP), it does not include any persons or organizations connected or affiliated with them.

This inconsistency in the enforcement of the EU restrictive measures was also identified in a February 2022 note from the French presidency to the Council of Europe "Combating the threat posed by actors contributing to radicalization leading to terrorism," which laments that "existing EU counter-terrorism sanctions regimes do not permit to target organisations or individuals who are not directly involved in the commission of terrorist acts, even if they have been active in the spread of radical rhetoric."

5. Samidoun: PFLP NGO Proxy in Germany: An Entity Vector of Radicalization

5.1. PFLP's Activities in Germany

The PFLP has developed support networks and been active in Germany and other European countries since the 1970s. As reported by the German federal government in an <u>answer</u> (September 29, 2021) to a parliamentary question, the "supporters of the PFLP were suspected of having helped plan the 1972 Munich Olympics attack. In the aftermath of the terror attack, supporters of the PFLP, among others, hijacked the Lufthansa plane 'Kiel', aiming to free the surviving terrorists from Munich." In 1976, the PFLP, with two German supporters, hijacked an Air France flight from Paris to Tel Aviv that was diverted to Entebbe.

According to the 2021 Constitutional Protection Report (<u>Verfassungsschutzbericht 2021</u>) written by the Federal Ministry of the Interior and Homeland, although "the PFLP is not active in terrorist activities [in Germany]," the terror group is still of concern to German security agencies for the role its supporters play in spreading anti-Israel propaganda, inciting hatred, and displaying antisemitic sentiment on German streets. Additionally, "Around 100 organized supporters of the PFLP live in Germany. The organization collects donations to support its structures and the armed struggle in the Middle East and tries to win new, increasingly young supporters among the Palestinians living here.



Former terrorists of the PFLP enjoy great respect among supporters and are specifically invited to Germany for indoctrination. The PFLP maintains contacts with the Islamist Hamas terror group and the left-wing extremist 'Marxist-Leninist Party of Germany' (MLPD)." "From this milieu numerous calls for violence against Jews are spread in social media" (emphasis added).

5.2. Samidoun Structure and Activities in Germany

Although the Verfassungsschutzbericht does not mention it, the Samidoun network is one of the main civil vehicles for establishing PFLP presence in Germany. The Samidoun network, which was also designated by Israel as a terror entity, is a grassroots organization active mainly in Europe and in North America, focusing on recruiting support and money for radical ideas, and often expressing support for violence, antisemitic rhetoric, and fear mongering.

Founded in 2012, Samidoun: Palestinian Prisoner Solidarity Network consists of an international network of local "chapters" whose main activities include supporting and celebrating the PFLP and its leaders; campaigning for the release of Palestinians jailed in Israel – above all convicted PFLP terrorist Georges Abdallah and promoting BDS campaigns and lawfare targeting Israel. Samidoun has declared its support for Palestinians' "legitimate resistance by all means possible, including their natural right to armed resistance...and support for the resistance camp [a term used for referring to other terror groups including Hamas, PIJ and Hezbollah] in Palestine, Lebanon and the region."

Samidoun operates in <u>Canada</u> (where its leaders currently reside), <u>Germany</u>, France (Collectif Palestine Vaincra and Samidoun Paris Banlieue), <u>Belgium</u>, <u>Sweden</u>, <u>the Netherlands</u>, <u>Greece</u>, <u>Spain</u>, the <u>United States</u>, <u>Palestine</u>, <u>Hungary</u>, <u>Brazil</u>, UK, Lebanon and Iran.

As mentioned above, in February 2021, the Israeli Ministry of Defense designated Samidoun as a <u>terror organization</u>. According to the MoD, the NGO "acts on the PFLP's behalf abroad" and "plays a leading and significant role in the PFLP's anti-Israel propaganda efforts, fundraising, and recruiting activists. These activities compliment the armed and violent terrorist struggle that the PFLP engages in against Israel."

The designation order indicates that "the leadership of Samidoun belongs to the PFLP, some of them are senior members of the PFLP and are even members of the PFLP's central committee," and that "the chief coordinator of Samidoun is Khaled Barakat. Barakat is a senior member of the PFLP." As <u>reported</u> by the National Post (Canada), Israel Security Agency documents revealed that "Barakat was reprimanded by his PFLP comrades for insufficiently distancing the PFLP from Samidoun."



As described by Barakat in a November 1, 2022 <u>article</u>, the "radical voices" of grassroots organizations such Samidoun and its partners in Europe and in North America can serve as a "popular international incubator" for the "armed resistance in Palestine."

Samidoun (Samidoun Deutschland) is very active and visible in Germany and organizes demonstrations in several German cities, including Berlin and Frankfurt, calling for the "liberation of Palestinian prisoners", including PFLP terrorists, such as PFLP Secretary-General Ahmad Sa'adat and George Ibrahim Abdallah. The German branch has also hosted events that featured PFLP members.

The German branch has also maintained a <u>Facebook account</u> since November 2020 and uses social media in order to spread PFLP propaganda. On the internet, it <u>celebrates</u> the foundation of the PFLP, <u>commemorates</u> the elimination of Abu Ali Mustafa (former PFLP's Secretary-General), <u>supports violence</u> and the <u>elimination</u> of Israel via the slogans "Free Palestine, from the river to the sea" and "Together against Zionism and in support of the resistance of the Palestinian people until liberation and return."

Khaled Barakat lived in Germany from 2016 to 2019, but his application for extension of the resident permit was rejected, and a <u>four-year entry ban</u> was imposed, "owing specifically to what the German Interior Ministry called Barakat's <u>proclivity for violent</u>. antisemetic rhetoric." In March 2022, the Berlin Administrative Court (VG Berlin), rejected <u>his appeal</u>, finding that Barakat is at least close to the PFLP," and that he "repeatedly participated in activities of the PFLP in Germany and/or appeared publicly under the PFLP label." The court further described Barakat's "support for a terrorist organization is a case of endangering public safety according to the definition in Section 54 (1) no. 2 of the Residence Act," and "The connection between the plaintiff's position on the PFLP…and his statements on the armed resistance refutes the…claim that the plaintiff only identifies with individual humanitarian/political goals of the PFLP."

Apparently, as result of the ban, Barakat was <u>denied</u> entry into the European Union in October 2022. Barakat was supposed to take part in "the march of return and liberation" in Brussels on October 29, 2022, <u>reportedly</u> an event where "Pro-Palestinian activists marched across Brussels shouting violent slogans, wearing terrorist organization headbands and carrying posters glorifying terrorist figures."

This demonstration was <u>initiated</u> by Masar Badil (Palestinian Alternative Revolutionary Path Movement) and <u>endorsed by over 100 groups</u>, including Samidoun. Samidoun was the <u>main platform for raising funds</u> for this event.





In Bildern: Der Marsch für Rückkehr und Befreiung in den Straßen von Brüssel



SAMIDOUN.NET
In Bildern: Der Marsch für Rückkehr und Befreiung in den Straßen von Brüssel
Am Samstag, den 29. Oktober, zog der Marsch für Rückkehr und Befreiung in Brüssel mit klaren...

Source: Samidoun Deutschland's Facebook account:

 $\label{lem:https://www.facebook.com/SamidounDeutschland/posts/pfbid02dHqZ937UFDvCArMn5LQF75i6z8tmdXt2M2fAuR1b18PPLrTv]sK4jMjh68u4tjvl?_cft_[0]=AZWGCY2VI-_-eO]cdchTZ0kqv9_4RLhwOwq]2]y43LAVOvEySxGtlD3R6WYkh36ny50Z9CUVuQuO80YngeUzmt1Cjlpa13fiXhJnQIFyWajOu2UFXnNBI06uFF861JK0Qxi360azSwuUSqfBx6wM7Sz3419x4-aUN63Yqg6LmjNkUYMY_RJzC32qntmXdl6jL4s&_tn_=%2CO%2CP-R$

Furthermore, in March 2019, Berlin's Interior Ministry <u>banned</u> Rasmea Odeh, a convicted PFLP terrorist who "spent 10 years in an Israeli prison for her role in <u>the bombing attack</u> at a <u>Jerusalem supermarket that killed two Hebrew University students</u>, Leon Kanner and Eddie Joffe." As reported by <u>Samidoun</u> and the <u>PFLP</u> itself, Odeh was invited to speak at an event organized by Samidoun in the Dersim Cultural Center in Berlin.

On April 30, 2022, Berlin formally banned pro-Palestinian demonstrations until May 2, 2022, following antisemitic statements made by some protesters. Despite the ban and as reported by the Berlin Spectator, "Palestinian pro-terror groups took part in the 'Revolutionary May 1st', including 'Palestine Speaks' and 'Samidoun'...its members chanted anti-Semitic slogans including 'From the river to the sea, Palestine will be free.'"

The French government went a step further, identifying Samidoun's French chapter, Collectif Palestine Vaincra, as a "vector" of radicalization. In a February 2022 official note, France, which then held the Presidency of the Council of the European Union, <u>published</u> "Combating the threat posed by actors contributing to radicalisation leading to terrorism," and accused Collectif Palestine Vaincra, of "play[ing] a key role in the dissemination of such [radical] ideologies and in the subsequent radicalisation."

Subsequently, on March 9, 2022 the French government outlawed Collectif Palestine Vaincra. The <u>decree of dissolution</u> referenced clauses 6 and 7 of <u>Article L. 212-1</u> of the Internal Security Code, which permits dissolving groups that:

 Provoke discrimination, hatred or violence towards people because of their ethnicity, nationality, race, or religion, and/or are found to propagate ideas or theories which justify or encourage such discrimination, hatred or violence



(clause 6).

• Engage in acts that provoke terrorism (clause 7).

On April 22, 2022, the French State Council <u>suspended</u> the decree, pending an appeal by the NGO.

It appears that Germany, too, has the requisite tools to deal with groups such as Samidoun. In 2020, the German Federal Ministry of the Interior, Building and Community banned Hezbollah because it "openly calls for the violent elimination of the State of Israel and questions the right of the State of Israel to exist. The organization is therefore fundamentally against the concept of international understanding, regardless of whether it presents itself as a political, social or military structure." PFLP-tied NGOs like Samidoun are in the same category, and the ban should be extended to them.

Conclusion and Recommendations

As laid out in this paper, existing anti-terror policies are insufficient to address contemporary activities of terror-affiliated NGOs, particularly in the context of development aid.

Terror groups' abuse of civil society structures is not a new phenomenon, as attested to in counterterror literature and among policy makers. In 2014 already, the Financial Action Task Force (FATF) identified the phenomenon as widespread and noted that "Risk of Terrorist Abuse in Non-Profit Organisations" is "the second most commonly observed method and risk of abuse in the submitted case studies relates to the existence of, or suspicion of, an operational affiliation between an NPO [Non-Profit Organizations] and a terrorist entity."

As mentioned above, the Dutch government cancelled its contract with a Palestinian NGO over staff affiliations with the PFLP, and disqualified it as a development partner. Similarly, the EU investigated potential abuse of its funds on the same grounds.

The key to addressing the inherently difficult question of preventing abuse is to develop mechanisms to better identify non-traditional extremist and radicalization agents that are affiliated with designated terror groups even if they do not necessarily participate in physical violence. Such vetting should not rely solely on classified information available only to intelligence and security services, but rather should build on readily available data collection methods.

This points to the crucial conclusion that, irrespective of the Israeli decision to designate six NGOs as terror entities, the publicly available evidence of **affiliation between these**NGOs and the PFLP should have been sufficient to disqualify them as partners in any



development project. Evidence of this affiliation, taken solely from publicly available source, appears in Annex "The Links between the PFLP and the European Government-funded NGO Network."

Recommendations

The following recommendations are aimed at assisting policy makers in expanding and implementing existing anti-terror regulations in the context of development aid. They endeavor to assist in building internal capacity in development aid frameworks that would identify nontraditional extremist and radicalization agents that are affiliated to designated terror groups but do not overtly participate in physical violence.

NGO Monitor recommends that governments consistently implement clear and specific mechanisms to ensure that no resources or support are given to NGOs that are linked to terror or violence.

For example:

- 1. Government anti-terror policies with regard to NGO funding must be proactive, with continuous monitoring and analysis of terror financing, as well as of radicalizing behavior and rhetoric by NGOs.
- 2. Governments should organize regular staff training sessions in relevant ministries, agencies, and diplomatic missions on misuse of aid, including diversion and fraud. These presentations should include examples of NGO support for violence and affiliation with terrorist groups. This will ensure that professional and diplomatic staff are aware of the current developments and are able to respond.
- 3. In instances where the Israeli government has taken measures restricting NGOs on the basis of terror-related links and activities, or has other information pertaining to such links, the details should be conveyed directly to relevant officials in the donor governments.
- 4. The German government should enact and implement policies that would prevent Samidoun Deutschand from raising donations in Germany. It should utilize existing policies and restrictions concerning hate, incitement to violence, and antisemitism (such as the IHRA Working definition with its examples) to evaluate regulations concerning non-profit sector.
- 5. Donor governments should adopt the following rigorous vetting practices:

Before the grant period:'



- Evaluations must not be limited to determining technical capacity, but must consider all aspects of the potential grantees' activities, as well as the status and activities of any project partners.
- Governments must not rely only on NGO self-reporting or statements from allied international NGOs. Officials must review publicly available information, including, but not limited to, a grantee's website and social media accounts, posts by leading officials at the organization, media reports regarding the NGO and its officials, and documentation such as court records and filings with local regulatory bodies.
- Local governments should engage with their counterparts from donor states to inform them of evidence of terror or other violent activity by grantees or their personnel.
- NGOs should submit the names of all employees and board members to allow for background checks to ensure that none is connected to designated terrorist organizations and other violent actors.

During the grant period:

- Governments should establish investigative capacities and procedures, including the suspension of funds and cancellation of contracts, when evidence suggests that an NGO is violating grant conditions relating to terrorism and terror financing. Such evaluations must be thorough and independent, cannot rely on NGO self-reporting, and must provide mechanisms for third-party submissions.
- Vetting should also occur at regular intervals during the duration of the grant period.
- Grantees should immediately inform donor governments of the arrests of NGO officials that take place during the grant period.

After the grant period:

• Governments must formulate guidelines for determining when NGOs, whose contracts were cancelled over violations of anti-terror regulations, can become re-eligible for future grants.



Annex

The following annex focuses only on selected individuals and organizations from German-funded, designated, PFLP-linked NGOs (Al-Haq, Bisan, DCI-P, and UAWC). For comprehensive information on the individual and organizational ties between the PFLP and seven Israeli-designated NGOs, see NGO Monitor's report (in English) "Clear and Convincing: The Links between the PFLP and the European Government-funded NGO Network."

The Links between the PFLP and the European Government-funded NGO Network

On October 22, 2021, Israel designated six Palestinian NGOs as terrorist entities due to their links to the Popular Front for the Liberation of Palestine (PFLP): Defense for Children International-Palestine (DCI-P), Union of Agricultural Work Committees, Al-Haq, Addameer, Union of Palestinian Women's Committees (UPWC), and Bisan Center for Research and Development (Bisan). A seventh – Health Workers Committee (HWC) – had been designated in January 2020.

Since then, the NGOs, donor governments, and allies in civil society and the UN have claimed they have not seen anything to justify the declarations.

The evidence presented in this annex – compiled exclusively from open source materials—proves this narrative inadequate and inaccurate. Irrespective of the information possessed by the Israeli government and intelligence agencies, there is overwhelming, publicly available evidence that ties these NGOs and their leadership to the PFLP. On its own, this should have been enough of a reason for European governments not to fund and/or partner with the NGOs.

Of particular note, we found:

- Five of the NGOs Union of Agricultural Work Committees, Union of Palestinian Women's Committees, Addameer, Health Work Committees, Bisan Research & Development Center have highly visible **organizational links** to the PFLP.
- The PFLP has issued statements of support for the NGOs, highlighting the links.
- Three officials Samer Arbid, Walid Hanatsheh, Abdel Razeq Farraj– indicted for their alleged involvement in a deadly August 2019 bombing that killed an Israeli



teenager. All of them have been claimed by the PFLP as members of the terror group.

- Nine NGO officials convicted for their involvement in planning or executing other terrorist attacks.
- Thirty-seven additional NGO officials affiliated with the PFLP.
- Five financial institutions Citibank, Arab Bank, American Express, Visa, Mastercard shut down online donations and accounts of PFLP-linked NGOs.
- In 2022, the Dutch government announced the results of an 18-month audit conducted by a Dutch firm that identified **34 individuals** who held positions in both UAWC and the PFLP between 2007-2020. As a result, the Netherlands canceled its contract with UAWC.

Because our research is based on open source information and subject to the transparency (or lack thereof) on the part of NGOs, it is distinctly possible that more officials are affiliated to the PFLP and/or involved in terror-tied activities.

As described in great detail below, these findings are based on statements from the PFLP acknowledging NGO officials as members, the alleged involvement of NGO officials in a string of terrorist attacks, indictments and convictions of NGO officials on terror-related charges, and social media posts documenting participation in and support for PFLP activities.

There are also Palestinian and academic sources identifying NGOs as being established by or otherwise official PFLP affiliates; PFLP leaders embracing the designated NGOs; and instances of PFLP leaders taking part in NGO events and initiatives, and vice versa. Over the years, many officials – in particular those from the European governments that were funding these NGOs – have refused – at least publicly – to acknowledge the extensive evidence presented in this report. For political reasons, their denials may continue. But the documentation presented in this report renders these denials untenable.

Organizational Ties between the PFLP and Designated NGOs

A number of sources clearly indicate organizational ties between the designated NGOs and the PFLP. More broadly, the PFLP identified the NGO network as part of the "Front" and pledged its support, following IDF closure of the offices of designated NGOs. In an August 30, 2022 speech, PFLP Deputy Secretary-General, Jamil Mezher said, "We send a message to the Zionist enemy: The campaign of targeting, harassment and arrests against the leaders and members of the Front and the frantic war against the Front and its administrative, union, women and student organizations has not and will not succeed in repressing the Front or preventing it from continuing its resistance until liberation and return."



Union of Agricultural Work Committees' Organizational Ties to the PFLP Sources Identifying UAWC's PFLP Affiliation

- A May 1993 <u>USAID-engaged audit</u> identified UAWC as the "PFLP's agricultural organization", while the <u>Palestinian Fatah party</u> described the NGO as a "PFLP affiliate".
- On January 5, 2022, the Netherlands <u>announced</u> the cancellation of a contract with UAWC citing ties to the PFLP. The report by an independent investigation commissioned by the government confirmed that 34 UAWC employees in 2007-2020 had ties to the PFLP, some holding leadership positions in the terrorist group concurrent to their employment at UAWC.
- The investigation also noted that, <u>based</u> on "18 events that took place in the period between 2007 and 2020," "there are indications of organizational ties between the UAWC and the PFLP as well."

PFLP Participation in UAWC Events

- In 2014, UAWC opened a center to market agricultural products. The inaugural event was attended by UAWC's General Director and Abdul Rahim Malloh, then Deputy Secretary-General of the PFLP.
- In 2012, <u>UAWC organized an event marking "the Nakba</u>," during which, then UAWC chair of the board Jamil Al-Zaanin "extended a greeting of love, loyalty, dignity, and pride to our captives in the usurping occupation prisons who are fighting...for their rights and freedom. All greetings to them, first and foremost, Secretary General of the Popular Front Ahmed Saadat..."
- In 2011, according to an article in Alwatan Voice, <u>UAWC "honored dozens of prisoners" at an event attended by leading PFLP officials</u>, including members of the Central Committee.
- In 2010 in Ramallah, <u>Deputy Secretary-General of the Popular Front for the Liberation of Palestine</u> Abdel Rahim Malloh participated in UAWC's "<u>Land Day</u>" commemorations.

(The Dutch audit has not been released to the public, so it is unknown whether these instances are related to the "18 events" mentioned above.)



Khaled Hidmi (UAWC <u>General Director</u> until <u>2014</u>) and PFLP Deputy Secretary-General Abdel Rahim Malloh together at a UAWC event.

Source: <u>UAWC</u>, <u>Wattan</u>



Health Work Committees's Organizational Ties to the PFLP

PFLP Statements Supporting HWC

In June 2021, the PFLP condemned Israeli "raids" of HWC's offices, declaring that "the Zionist enemy, with its various security and intelligence services, continues its extensive war on the Popular Front, as it intensified in recent days its frantic arrest campaigns against the leaders and activists of the Front."

Other Sources Identifying HWC's PFLP Connection

HWC is the West Bank and Jerusalem "<u>sister organization</u>" of the Union of Health Workers Committees (UHWC), a Gaza-based NGO identified by Fatah as a PFLP "<u>affiliate</u>" and by <u>USAID-engaged audit</u> as "the PFLP's health organization." According to HWC, "among the outcomes of the post-Oslo situation, as a result of the geopolitical situation, <u>the Health Work Committees formed separate administrations in the West Bank and Gaza Strip</u>."

According to an <u>article</u> published by PFLP's *Al-Hadaf* news outlet written by Mona El-Farra, "<u>a founding member of UHWC</u>," "the Popular Committees for Health Services" (the <u>original name</u> of UHWC) was "politically sponsored by the PFLP."

Conviction of Juana Rishmawi

Juana Rishmawi, who served as a fundraiser for HWC, was arrested by Israel in April 2021.

In <u>November 2021 she agreed to a plea bargain agreement</u>. The agreement acknowledged that the HWC is "controlled by the PFLP" and was involved in "raising funds for the PFLP's activities, financing PFLP activities and carrying out PFLP's activities."

The charge sheet to which she pled states, "Over the years and in the period beginning at least in 2006 to September 2019, the organization worked systematically to fraudulently receive donations from said countries [UK, EU, Denmark, Switzerland, and Belgium] in order to increase the organization's revenues and thus fund the activity of the PFLP and strengthen the PFLP status in the region and its infrastructure."

It also notes that at least four individuals who served in financial positions at HWC (Walid Hanatsheh, Sai'd Abidat, Amro Hamuda, Tayseer Abu Sharbak) are PFLP members.



Conviction of Daoud Ghoul

In 2016, the Jerusalem District Court sentenced HWC Director of Youth Programs Daoud Ghoul to an 18-month prison sentence over his PFLP activity. According to the conviction, "at a date prior to 2006, the appellant [Daoud Ghoul] joined the Popular Front for the Liberation of Palestine organization, worked in management positions at the Nidal Centre, a place of activity for the organization [PFLP], and in the Union of Health Work Committees-Jerusalem [Health Work Committees]...the framework under which the organization [PFLP] began to operate after the Nidal Centre was closed in 2009."

HWC's Jerusalem Branch Designated as an Unauthorized Association in 2015

- On June 9, 2015, Israel's Defense Minister <u>declared</u> that "the group of people or institutions or association known as the 'Union of Health Work Committees-Jerusalem'...or 'Health Work Committees'...or any other name that this association will be known by, including all of its factions and any branch, center, committee or group of this association is an unauthorized association, as defined by the Defense Regulations" (p.6489). In 2016, the Israeli High Court of Justice (HCJ-3923/15), stated that "based on credible information, the PFLP carried out activity in the apartment, under the aegis of an organization named the 'Union of Health Work Committees-Jerusalem,' which later was also declared a terrorist organization."
- HWC's <u>Youth Development Program</u>, "A community, cultural, and social development program that provide services to Jerusalemite youth through '<u>Nidal Center</u>," was shut down by Israeli authorities from 2009 to 2012 because, in the words of the Jerusalem District Court, it served as "<u>a place of action of the [PFLP] organization</u>." The <u>Nidal Center</u> also houses HWC's <u>Kanan project</u>, a program <u>implemented</u> by six political NGOs, including HWC, DCI-P, UPWC, and Bisan.

Bisan Research & Development Center's Organizational Ties to the PFLP

 A 2014 dissertation by Sbeih Sbeih (Université de Versailles Saint-Quentin-en-Yvelines) on Palestinian NGOs claims that "some [NGOs], because of their link to the PFLP, opposed the Oslo Accords. Such was the case of Bisan."

Bisan Officials Cited in This Report

• In addition to the organizational ties between Bisan and the PFLP, this report identifies current and former Bisan board members, officials, and employees who are linked to the PFLP.



NGO Officials Claimed by the PFLP Itself - Involvement in the Shnerb Murder

On multiple occasions, the PFLP issued statements identifying NGO officials as PFLP members and leaders. In particular, the PFLP and its organs have repeatedly identified as PFLP members NGO officials who were arrested and indicted over their alleged involvement in a deadly August 2019 bombing.

On August 23, 2019, a PFLP cell detonated an explosive device near Dolev, murdering 17-year-old Israeli Rina Shnerb, and wounding her father and brother. On December 18, 2019 Israel announced the arrests of 50 PFLP members – including NGO officials Samer Arbid, Walid Hanatshe and Abdel Razeq Farraj Charged with involvement in the killing. They are currently standing trial.

As discussed below, on August 22, 2022, a PFLP-affiliated student group marked the third anniversary of the murder, <u>writing</u>, "The leader comrades who commanded the military operation in the [Popular] Front are Abdel Razeq Farraj, Walid Hanatsheh, Samer Al-Arbid, [and] Itiraf Rimawi.... Pride, much pride, to the heroes of the Ein Bubin operation, and to those who will follow in their footsteps."

Samer Arbid

The PFLP's prisoner and ex-detainees committee in Lebanon held a protest in solidarity with Palestinian prisoners and displayed an official poster with Samer Arbid, referring to him as one of the members of the group that carried out the "Bubin operation" [in which 17-year-old Rina Shnerb was murdered]





Source: PFLP Lebanon branch website

Source: PFLP's Hadaf News

NGO Role(s)

UAWC's "financial director" at the time of his 2019 arrest.

Previous to his position at UAWC, <u>Arbid worked as an accountant for Addameer</u>. In correspondence with NGO Monitor, Swiss officials claimed that Arbid's employment at Addameer ended in 2015 (on file with NGO Monitor).



Terror Activity

Arbid is currently standing trial for allegedly <u>commanding</u> the PFLP terror cell that carried out the bombing attack. According to his <u>indictment</u>, Arbid also prepared and detonated the explosive device.

PFLP on Samer Arbid

The PFLP and its associated institutions have issued several statements in support of Arbid, while identifying him as a PFLP operative:

- On August 30 2020, the PFLP issued a <u>statement</u> referring to Arbid as a "prisoner and commander," and "one of the heroes of the Bubeen operation" – referring to the August 2019 bombing.
- On August 23, 2022, on the occasion of the third anniversary of the attack, the PFLP's student wing, the Democratic Progressive Student Pole (DPSP), <u>commemorated</u> the attack and <u>praised</u> Arbid, referring to him as a "leader comrade" who "commanded the military operation in the Front."
- On <u>January 27, 2020 the PFLP reported</u> that "senior officials of the PFLP" participated in an event organized by the "The Prisoners Committee of the Popular Front for the Liberation of Palestine" in Gaza. According to the PFLP's account, "During the event, the participants raised pictures of the prisoner Hanatsheh, the prisoner Mays Abu Ghosh, the prisoner Samer Al-Arbeed, and all the prisoners who were arrested from the Popular Front recently." (emphasis added)
- On December 7, 2019, a PFLP-linked media outlet reported: "In his statement made during a central celebration organized by the PFLP in Gaza on the occasion of the anniversary of its establishment, [PFLP Deputy Secretary-General] 'Mezher expressed his congratulations, pride and esteem for the martyrs, the wounded and our heroic prisoners, first and foremost, the leaders Samer Arbid, Khalida Jarrar, Ahmad Zahran, Walid Daqqa and [the rest of] our comrades in the Front's organization in the prisons, and to the martyrs of the Palestinian revolution, firstly, the doctor [George Habash's alias], Abu Ali [Mustafa], Maher Al-Yamani, Ghassan Kanafani, Wadie Haddad, Guevara of Gaza [Mohammed Al-Aswad's alias]."

Previous Terror-related Arrests

According to UAWC, Arbid was placed in administrative detention in <u>December 2015</u>. In a 2013 <u>video</u>, Arbid describes numerous arrests and states that he was arrested at the beginning of 2003 and sentenced to 2.5 years in prison.



PFLP Activity

In May 2019, Samer Arbid attended a memorial <u>event</u> organized by the PFLP for <u>PFLP</u> <u>political bureau member</u> Rabah Muhanna, who, according to information posted by the terror group, "<u>contributed to the establishment</u>" of several PFLP-affiliated NGOs, including Union of Health Workers Committees (UHWC), UAWC, and Addameer. The hall was decorated with PFLP paraphernalia.

Walid Hanatsheh







The PFLP's student wing, the Democratic Progressive Student Pole (DPSP), commemorated the attack and praised Hanatsheh, (Source: PFLP Website)

NGO Role(s)

HWC's <u>finance and administration manager</u> at the time of his 2019 arrest. In addition to his position at HWC, Hanatsheh was also <u>listed as a member of the board of directors</u> at the <u>Palestinian Non-Governmental Organizations Network</u> (PNGO) - an umbrella organization of Palestinian NGOs that is <u>itself linked to Palestinian terrorist organizations</u>.

Terror Activity

He was <u>arrested</u> in October 2019 and is allegedly <u>the leader of PFLP terror operations</u>. In this capacity, he is <u>accused of commanding Samer Arbid</u>. According to an Israeli media report, Hanatsheh <u>financed</u> the August 23 bombing.

PFLP on Walid Hanatsheh

The PFLP and its associated institutions have issued several statements in support of Hanatshe, while identifying him as a PFLP operative:

• On October 13, 2019, the PFLP issued a statement labeling Walid Hanatshe as a "leader in the Popular Front."



- On August 23, 2022, on the occasion of the third anniversary of the attack, the PFLP's student wing, the Democratic Progressive Student Pole (DPSP), <u>commemorated</u> the attack and <u>praised</u> Hanatsheh, referring to him as a "leader comrade" who "commanded the military operation in the Front."

Previous Terror-related Arrests

According to Addameer, Hanatshe was <u>arrested multiple times</u> in 2002-2012 and placed in administrative detention in May 2002-December 2005, January 2009-January 2010, and November 2011-August 2012.

In 2012, then Israeli Home Front Defense Minister Matan Vilnai mentioned the HWC "finance manager," who was "a senior activist in the PFLP terrorist organization... [and who] was involved prior to his arrest in activities that endanger the security of the region and the public."

In 2005, during Israeli High Court deliberations, Hanatsheh was described as "<u>a senior activist in the PFLP</u>." The Court cited security sources indicating that "the status of the respondent [Hanatsheh] in the hierarchy and the **risk that he will be integrated into a senior position in military activity in the PFLP is significant**" [HCJ 6845/05] (emphasis added).

PFLP Activity

In May 2019, Hanatsheh attended a memorial <u>event</u> organized by the PFLP for <u>PFLP</u> <u>political bureau member</u> Rabah Muhanna, who, according to information posted by the terror group, "<u>contributed to the establishment</u>" of several PFLP-affiliated NGOs, including Union of Health Workers Committees (UHWC), UAWC, and Addameer. The hall was decorated with PFLP paraphernalia.



Abdel Razeq Farraj



Source: <u>Facebook page: "Freedom for the</u>
<u>Prisoner Freedom for (sic) Abdel Razeg Farraj</u>

NGO Role(s)

UAWC's "Finance and Administration Director" at the time of his 2019 arrest.

Terror Activity

According to his <u>indictment</u>, Razeq Farraj held a senior PFLP post and authorized the August 2019 bombing. He is currently standing trial.

PFLP on Abdel Razeq Farraj

On August 23, 2022, on the occasion of the third anniversary of the attack, the PFLP's student wing, the Democratic Progressive Student Pole (DPSP), <u>commemorated</u> the attack and <u>praised</u> Farraj, referring to him as a "leader comrade" who "commanded the military operation in the Front."

In October 2022, the PFLP <u>named</u> Farraj as a PFLP member who had launched a hunger strike while in Israeli prison.

Previous Terror-related Arrests

According to a 2018 report published by Amnesty International, Farraj was <u>arrested</u> <u>several times</u> and "served a six-year sentence in an Israeli prison after being convicted of affiliation with the Popular Front for the Liberation of Palestine."

PFLP Activity

In May 2019, Farraj attended a memorial <u>event</u> organized by the PFLP for <u>PFLP political</u> <u>bureau member</u> Rabah Muhanna, who, according to information posted by the terror group, "<u>contributed to the establishment</u>" of several PFLP-affiliated NGOs, including



Union of Health Workers Committees (UHWC), UAWC, and Addameer. The hall was decorated with PFLP paraphernalia.

NGO Officials Convicted of PFLP Recruitment, Planning or Executing Terrorist Attacks

Several current and former NGO board members, officials, and employees have been convicted of recruitment to the PFLP, executing or planning terrorist attacks. Some officials have been claimed as PFLP members by the terror organization itself. It is worth noting that due to NGOs' lack of transparency, we are not always able to report staff members' current employment status.

<u>Iteraf Hajaj (Rimawi)</u>

NGO Role(s)

<u>Served</u> as Executive Director at Bisan Center for Research and Development through at least <u>September 2018</u>. While It is unclear when he ended his position at Bisan, Rimawi <u>writes</u> on his Facebook account that he started to serve as "Branch director" at the Edward Said National Conservatory of Music from May 28, 2019

According to the Edward Said National Conservatory of Music, at the time of his arrest, Rimawi <u>served</u> as the director of the organization's Ramallah office.

Terror Activity

In a <u>statement following his September 2019 arrest</u>, Israeli security officials identified Rimawai as being responsible for PFLP "clandestine operations."

PFLP on Iteraf Hajaj (Rimawi)

On August 23, 2022, on the occasion of the third anniversary of the attack, the PFLP's student wing, the Democratic Progressive Student Pole (DPSP), <u>commemorated</u> the attack and <u>praised</u> Rimawi, referring to him as a "leader comrade" who "commanded the military operation in the Front."

Previous Terror-related Arrests

According to the PFLP-linked Samidoun, Rimawi was <u>arrested several times</u> in 1995-2017. A 2016 Israeli High Court of Justice decision (<u>HCJ-2524/16</u>) referred to Rimawi as a "PFLP member" who "posed a security threat."



<u>Ubai Aboudi</u>

NGO Role(s)

Aboudi has <u>served</u> as <u>Bisan's Executive Director</u> since April 2019. Aboudi previously <u>served</u> as UAWC's "M&E [Monitoring and Evaluation] Officer."

Terror Activity

He was <u>arrested</u> by Israeli authorities on November 13, 2019.

In June 2020, Aboudi was <u>sentenced</u> to 12-months in prison. According to his <u>conviction</u>, Aboudi "was convicted of being a member and an activist of the Popular Front organization during the period starting from 2016 and ending in July 2019." Specifically, Aboudi "was responsible for recruiting additional activists to the organization from young people and students, as well as strengthening the organization's infrastructure in the area."

According to Amnesty International, "Ubai Aboudi had been arrested in 2005 and 2010. He has spent over four years in Israeli prisons on charges including membership of the Popular Front for the Liberation of Palestine (PFLP)." In this context, in 2005, the Israeli Ministry of Foreign Affairs published a report identifying Aboudi as a member of a cell that "planned to perpetrate a terrorist attack at the IDF Armored Corps Museum at Latrun, using two suicide terrorists and a car bomb."

Shawan Jabarin

NGO Role(s)

Shawan Jabarin has served as Al Haq's <u>General Director</u> since October 2006 and was elected FIDH's <u>Vice President</u> and Secretary General in <u>2013</u> and <u>2016</u>, respectively. He also served on DCI-P's board in at least <u>2005-2009</u>.

Terror Activity

Jabarin was <u>convicted</u> in 1985 for recruiting and arranging training for members for the PFLP. <u>A 1994 Israeli statement to the UN</u> notes that he "had not discontinued his terrorist involvement and maintains his position in the leadership of the PFLP."

In a series of 2007-2009 proceedings, the Israeli Supreme Court repeatedly ruled that Jabarin was a PFLP operative:

• Due to his PFLP ties, Jabarin has previously been <u>denied exit visas by Israel</u> and <u>Jordan.</u>



- In 2007, the Israeli Supreme Court rejected Jabarin's appeal to travel abroad, stating that "the current petitioner is apparently acting as a manner of Doctor Jekyll and Mister Hyde, acting some of the time as the CEO of a human rights organization, and at other times as an activist in a terror organization which has not shied away from murder and attempted murder, which have nothing to do with rights..." (emphasis added)
- In 2008, the Israeli Supreme Court <u>noted</u> that Jabarin is "among the senior activists of the Popular Front terrorist organization."
- In 2009, Jabarin was again prohibited by the Israeli authorities from travelling abroad. Jabarin appealed to the Israeli Supreme Court which rejected his appeal, stating, "We found that the material pointing to the petitioner's involvement in the activity of terrorist entities is concrete and reliable material."

PFLP Activity

According to <u>multiple Arabic</u>-language <u>media</u> sources, Jabarin represented the PFLP at a December 2011 meeting of the Follow-Up Committee for Issues of Public Liberties and Trust Building. This body served as a <u>reconciliatory body</u> between Hamas, Fatah, Palestinian Islamic Jihad, the PFLP, and other Palestinian factions.

In February 2019, Jabarin <u>participated</u> in an event hosted by the PFLP in memory of "comrade fighter" Maher Al-Yamani. Al- Yamani was a PFLP "<u>member of the Central Committee and one of its most prominent military commanders</u>," and "coordinated special operations…in particular <u>the operation against an aircraft of the Israeli company El Al in July 1968 in Greece</u>."

In May 2019, Jabarin <u>attended</u> a memorial event_organized by the PFLP for PFLP political bureau member Rabah Muhanna, who, according to information posted by the terror group, "<u>contributed to the establishment</u>" of several PFLP-affiliated NGOs, including Union of Health Workers Committees (UHWC), UAWC, and Addameer. The hall was decorated with PFLP paraphernalia.



Source: Wattan News, 2019



Ahmad Maslamani



Source: PFLP Website

NGO Role(s)

According to the PFLP, Ahmad Maslamani was <u>co-founder and director of HWC in the West Bank</u> until his death in 2008.

Terror Activity

According to a 2001 article in *Haaretz*, <u>Israel security forces arrested Maslamani and two other PFLP members</u>. According to the article, Maslamani "helped organize and recruit activists to the Popular Front. [Maslamani and another PFLP member] were responsible for a long series of terrorist attacks carried out by Popular Front operatives in Jerusalem."

In 2002, Maslamani was convicted by an Israeli court "on the basis of his confession of the offense of membership in a terrorist organization." He served nine months in jail.

According to a January 2013 PFLP article, "Five years on: Remembering Comrade Dr. Ahmad Maslamani, struggler and healer of the Palestinian people," "Comrade Ahmad was arrested by the occupation forces on numerous occasions, spending a total of seven years in Israeli detention and prisons."

PFLP on Ahmad Maslamani

According to a 2014 article on the PFLP's website, Maslamani was a PFLP "<u>Central</u> <u>Committee member</u>" until his death. He "<u>helped to establish</u> the organization of the party [PFLP] in the city of Jerusalem.



Mahmoud Jiddah

NGO Role(s)

In October 2019, Addameer's website listed Mahmoud Jiddah as a <u>board member</u>. Jiddah also served as a board member at DCI-P in <u>2012-2016</u>. A May 13, 2017 <u>picture</u> taken at a <u>meeting of the DCI-P General Assembly</u> shows Jiddah standing next to DCI-P General Assembly President Nassar Ibrahim, indicating an ongoing affiliation with DCI-P.

Mahmoud Jiddah also attended the 2017 HWC general assembly.

Terror Activity

Jiddah was imprisoned by Israel for <u>17 years</u> for carrying out grenade attacks against Israeli civilians in Jerusalem in 1968. He was <u>released</u> in 1985 in a prisoner swap. A <u>February 2017 Al Jazeera article</u> adds that Jiddah was arrested in 1968 for joining the front and carrying out terrorist attacks in Jerusalem, Hebron, and Tel Aviv.

PFLP Activity

Media and other sources have identified Jiddah as a PFLP member, including in an <u>April 2017 Al-Araby article</u>, in 2016 by a <u>candidate for the Fort Lauderdale City Council</u>, and in a <u>March 2006 Al-Riyadh article</u>.