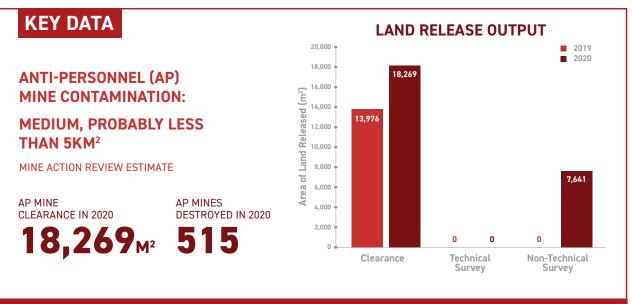




ARTICLE 5 DEADLINE: 1 JUNE 2028 NOT ON TRACK TO MEET DEADLINE



CURRENT LIKELIHOOD OF MEETING 2025 CLEARANCE TARGET (as per the Oslo Action Plan commitment): LOW

KEY DEVELOPMENTS

All mined areas are located in territory under Israeli control. To date, Israel has not authorised demining operations to be conducted by the Palestinian Mine Action Centre (PMAC), but progress is being made in clearance of mine contamination in the West Bank by The HALO Trust. Clearance at the Baptism Site, in the Jordan valley, was completed by HALO Trust in April 2020, while clearance of three priority minefields in the West Bank continues at a slow pace due to shortfalls in funding for quality assurance (QA) which, according to Israeli law, can only be conducted by an Israeli company.

RECOMMENDATIONS FOR ACTION

- Palestine should mobilise resources to complete clearance of the three priority minefields in the West Bank as soon as possible.
- Israel should mobilise resources and secure funds for the external QA in order to complete the clearance of the three priority minefields in the West bank as soon as possible.
- Israel should authorise surveys to establish a baseline of anti-personnel mine and other explosive remnants of war (ERW) contamination of all areas under its control in the West Bank.
- Israel should permit Palestinian deminers to receive training and carry out demining operations in the West Bank.

DEMINING CAPACITY

MANAGEMENT CAPACITY

- Higher Committee for Mine Action
- Palestine Mine Action Centre (PMAC)

NATIONAL OPERATORS

None

INTERNATIONAL OPERATORS

The HALO Trust

OTHER ACTORS

United Nations Mine Action Service (UNMAS)

UNDERSTANDING OF AP MINE CONTAMINATION

In its initial Anti-Personnel Mine Ban Convention (APMBC) Article 7 transparency report, submitted in November 2018, Palestine reported 69 areas suspected to contain anti-personnel mines on the border with Jordan, covering a total area of 18.51km². All of the mined areas were said to be under Israeli control.¹ Palestine also reported that it is not in a position to know whether there are further mined areas in East Jerusalem or in other areas of Palestine under Israeli control, including in the region of Israeli settlements or closed military zones.²

The Israeli Defence Forces (IDF) informed The HALO Trust in 2012 about the presence of 90 minefields in the West Bank, 13 of which were laid by the Jordanian military in 1948–67, while the remaining 77 were laid by the Israeli military along the Jordan River after the 1967 war. The minefields are located east of the security fence, inside a military buffer zone, and do not carry immediate threat to civilians. All the minefields, including those laid by the Jordanian military, are under Israeli military control.³ There are no known mined areas in the Gaza strip.⁴

Clearance operations must be coordinated with the Israeli authorities, in addition to PMAC, and, under Israeli law, must be quality assured by an Israeli company.⁵ In addition, in 2019 HALO Trust reported being made aware of three other anti-personnel mined areas in the Jordan Valley, namely at Shademot Mehola (65,000m²) and Sokot (228,000m²), containing a mix of anti-personnel and anti-vehicle mines; and at Taysir (5,500m²), which contains only anti-vehicle mines. Sokot is an Israeli-laid minefield while the other two minefields were laid by Jordanian forces.⁶ In 2020, HALO discussed the possibility to survey these three minefields with both Palestinian and Israeli authorities. However, given the current political sensitivity over the Jordan Valley, these minefields had to be put on hold until the Israeli National Mine Action Authority (INMAA) or IDF decides to clear them by themselves.⁷

As at end of 2020, there was nearly 0.26km² of confirmed mined area (excluding the Jordan Valley) across three minefields in Palestine and two minefields in no-man's-land between the West Bank and Israel (see Table 1).⁸ All five minefields had been laid by the Jordanian army.

The total at the end of 2020 is a reduction of $13,710m^2$ from anti-personnel mine contamination at the end of the previous year, following clearance of Nur a-Shams minefield in 2020 by HALO Trust.⁹

Mine action is subject to the 1995 Interim Agreement on the West Bank and the Gaza Strip, commonly known as the Oslo II accord, under which the West Bank is divided into three areas: Area A is under full Palestinian civil and security control; Area B is under full Palestinian civil control and joint Israeli-Palestinian security control; and Area C refers to areas where Israel has full civil and security control.¹⁰ Most mined areas are located in Area C of the West Bank, along the border with Jordan. Area C covers approximately 60% of the West Bank.¹¹

Palestine is also contaminated with ERW. According to UNMAS, PMAC has identified 46 ERW-contaminated areas in the West Bank. These areas are predominantly Israeli military training sites. In 2020, UNMAS also conducted an ERW impact survey in some locations close to these areas to better understand the impact of the contamination on the residents.¹²

Table 1: Mined area (excluding the Jordan Valley) (at end 2020)¹³

Governorate	Minefield Task	Contamination	CHAs	Area (m²)
Jenin	Qabatiya	AV and AP mines	1	8,212
	Yabad	AV and AP mines	1	40,032
Tulkarem	Nur a-Shams	AV and AP mines	1	24,100
Ramallah	No Man's Land Yalo	AV and AP mines	1	104,226
	No Man's Land - Canada Park	AV and AP mines	1	85,708
Totals			5	262,278

CHAs = Confirmed hazardous areas AV = Anti-vehicle AP = Anti-personnel

NATIONAL OWNERSHIP AND PROGRAMME MANAGEMENT

PMAC was established in accordance with Palestinian Minister of Interior decision on 25 March 2012,¹⁴ which appointed a director and created a Higher Committee for Mine Action as an interministerial body, with 27 members representing the ministries of education, foreign affairs, health, intelligence, interior, justice, and military liaison, as well as the police and the Palestinian Red Crescent Society. The Higher Committee for Mine Action, which serves as the national mine action authority, is tasked with developing mine action legislation and allocating resources for the sector.¹⁵ PMAC, which is located in the Ministry of Interior in Ramallah, is mandated to coordinate all aspects of mine action in the West Bank. It receives technical advice from.¹⁶ The committee has established a number of sub-committees to deal with technical issues, risk education, legal affairs, foreign affairs, and health and safety.¹⁷

In November 2016, Palestine announced that it was seeking to adopt and enact a mine action law. Palestine was hopeful of completing the legal procedures within a year and then presenting the draft law to the legislative council for endorsement, followed by signature by the President.¹⁸ As at May 2021, however, the process of developing and adopting the legislation was still ongoing.¹⁹ In November 2017, Palestine's constitutional court ruled that, in an event of contradiction, the obligations dictated by international conventions, including the APMBC, override national legislation.²⁰

PMAC, which has 11 employees,²¹ is staffed with personnel from the Palestinian National Security Forces, Civil Police, and Civil Defence. In 2013, 36 PMAC personnel were trained by UNMAS for demining but were not subsequently authorised by Israel to conduct clearance.²² The Civil Police have an explosive ordnance disposal (EOD) unit with 42 personnel in Bethlehem, Hebron, Jenin, Nablus, Qalqilya, Ramallah, and Tulkarem, who conduct rapid response to locate and remove items of unexploded ordnance (UXO). The EOD unit is only permitted to work in Area A of the West Bank.²³

PMAC does not have its own budget, and the Palestinian authority only provides funding for the salaries of PMAC

employees and the costs of the PMAC office.²⁴ As at July 2021, Israel had not granted Palestine the authorisation to conduct mine clearance operations.²⁵

In September 2020, UNMAS provided a one-year grant to PMAC to enable the Centre to mainstream gender in its explosive ordnance risk education (EORE) activities. The project aims to train particularly women to provide EORE in at-risk communities in the West Bank. In addition, the project supported capacity enhancement training, training of trainers (ToT), training of beneficiaries and publication of EORE materials.²⁶

Since November 2019 and throughout 2020, the Israeli government covered HALO's clearance operations costs at the Baptism Site Project. The clearance of the Jordanian laid minefields in Tulkarem and Jenin is not funded by either the Palestinian or the Israeli governments and HALO faces significant challenges raising funds for their clearance from donor countries.²⁷ PMAC does not provide direct funding for HALO Trust's clearance operations.

GENDER AND DIVERSITY

PMAC has said it has a gender policy and implementation plan and that it disaggregates data by sex and age.²⁸ There is reported to be equal access to employment for qualified women and men at PMAC, and three of PMAC's eleven employees (27%) are women, each in managerial/supervisory positions.²⁹

The HALO Trust has a global policy on gender and diversity. HALO's Palestine programme deploys all-male deminers from Georgia due to "cultural considerations". HALO's Palestinian employees include mechanical operators, medical and support teams. During 2020, HALO deployed a female finance officer and a female doctor at the Baptism Site. The representation of female employees varies according to the operation. For managerial positions within HALO's West Bank office team there is said to be equal access to employment for qualified women and men.³⁰

INFORMATION MANAGEMENT AND REPORTING

PMAC uses the Information Management System for Mine Action (IMSMA) database, Level 1.³¹

The HALO Trust follows the INMAA's national standards and provides daily and weekly reports as well as completion reports for every task. The information is also shared with PMAC weekly, along with completion reports and Geographic Information System (GIS) data for every completed task.³² As a result, all three entities are in possession of HALO Trust survey and clearance data relating to demining operations in the West Bank.

Palestine submitted an initial Article 7 report in November 2018, as required by the APMBC.³³ However, Palestine's Article 7 report covering calendar year 2018 (submitted in 2019), did not contain any further details, including the amount of mined area cleared in 2018.³⁴ As at June 2021, Palestine had yet to submit its Article 7 report for 2020.

PLANNING AND TASKING

PMAC has a Strategic Plan for 2017–20,³⁵ in which primary objectives are the clearance of the Nur a-Shams, Qabatiya, and Yabad minefields.³⁶ According to PMAC, there was an annual work plan in place for 2020.³⁷

HALO Trust's survey and clearance schedule in the West Bank is set in agreement with PMAC, INMAA, and its international donors.³⁸

LAND RELEASE SYSTEM

STANDARDS AND LAND RELEASE EFFICIENCY

The HALO Trust's standing operating procedures (SOPs), which are based on its international standards and which also comply with national standards, are approved by the INMAA. Once a year, The HALO Trust submits its SOPs, including any necessary amendments, to INMAA for approval.³⁹

To date, Israel has not authorised demining operations to be conducted by PMAC. In September 2013, however, the INMAA gave formal authorisation to HALO Trust to clear two minefields in the West Bank deemed high priority by PMAC. Following INMAA authorisation, HALO Trust began clearance in April 2014, and it has continued to do so ever since.

The HALO Trust works under the auspices of both INMAA and PMAC. Its manual clearance team in the West Bank is composed of deminers from Georgia with capacity varying between 15 and 22 deminers according to the task/work cycle. In addition, during 2020, HALO Trust deployed up to three armoured CASE721 wheeled medium loaders, two armoured tracked excavators, two armoured tracked excavators, and two industrial screeners. The machines were operated by a Palestinian team.⁴⁰ The HALO Trust's work in the West Bank complies with the Israeli Institute for Standards, in particular ISO 9001, 14001, and 18001. The HALO Trust carries out its own internal quality control (QC), which is conducted by senior programme staff, and which complies with the ISO standards and HALO Trust's own SOPs. In addition, as required by INMAA, 4CI Security, an external INMAA-certified QA/QC company, was contracted to monitor HALO Trust's clearance in accordance with Israeli National Mine Action Standards in the Baptism Site.⁴¹

The HALO Trust conducts both manual and mechanical clearance in the West Bank. It also uses a drone for survey and mapping purposes, and the maps generated are shared with all parties involved for planning and follow-up.⁴²

LAND RELEASE OUTPUTS AND ARTICLE 5 COMPLIANCE

LAND RELEASE OUTPUTS IN 2020

HALO Trust released 25,910m² of land in 2020 in the West Bank, including the Jordan valley. Of the released land, 7,641m² was cancelled while 18,269m² was cleared. A total of 515 anti-personnel mines were destroyed in the process.⁴³

Under Convention on Certain Conventional Weapons (CCW) Amended Protocol II, Israel reported that INMAA had cleared 216,930m² in 2020, and destroyed 1,200 mines and ERWs in the West Bank. However, there was no disaggregation on what proportion of this land release was of mined area (as opposed to battle area) or how many of the total destroyed explosive devices were anti-personnel mines.

SURVEY IN 2020

In 2020, HALO cancelled 7,641m² of area during clearance of Nur a-Shams minefield by reference to the Jordanian benchmark, which allowed HALO to draw the minefield boundaries and compare them to the Jordanian military map. Both Palestinian and Israeli authorities were involved in the process and provided their approval to reduce the area of suspected contamination to 24,100m².⁴⁴

HALO Trust performs survey as part of its clearance operations of the Jordanian-laid minefields in Area C of the West Bank. It is part of pre-clearance task preparation and is of CHAs already recorded in PMAC's database and on maps.⁴⁵

CLEARANCE IN 2020

In 2020, HALO cleared a total of 18,269m² in the West Bank destroying 515 anti-personnel mines and 663 anti-vehicle mines in the process.

In Tulkarem governorate, HALO cleared 6,069m² of Nur a-Shams minefield and destroyed 13 anti-personnel mines, all PRB-M35s. In the Baptism Site of Jordan valley, HALO Trust cleared 12,200m² of mined area destroying 502 anti-personnel mines and 663 anti-vehicle mines in the process.⁴⁶

Operator	Governorate	Minefield task name	Area cleared (m²)	AP mines destroyed	AV mines destroyed	UXO destroyed
HALO Trust	Tulkarem	Nur a-Shams	6,069	13	0	0
HALO Trust	Jordan valley	The Baptism Site	12,200	502	663	0
Totals			18,269	515	663	0

Table 2: Mine clearance in 2020⁴⁷

Clearance of the Jordanian-laid minefields in Tulkarem and Jenin governorates continues to be influenced by the availability of funds for external QA, and output in 2020 more than halved compared to the 13,976m² cleared by HALO Trust in Jenin governorate in 2019. HALO could only start clearance of Nur a-Shams minefield in September 2020 after a private donation for the QA was secured from European Union Instrument Contribution to Stability and Peace (EU IcSP). The clearance ended on 3 December 2020 and marked the end of the grant that was signed in August 2018.48 Due to weather conditions and the ending of funds, the task of Nur a-Shams could not be completed and over 500m² was left uncleared. The area was fenced, marked, and will be cleared and completed in HALO's next cycle of operations. As at April 2021, HALO could not secure any funds for its operations in 2021 and expected that its clearance outputs will be further reduced in 2021.49

The Baptism Site clearance operation was entirely funded by the Israeli Ministry of Defence (MoD) from July 2019 until its completion in April 2020. Between January and April, HALO completed the BAC and cleared 12,2000m² of anti-personnel minefield located on the southern side of the site main entrance. HALO also located and destroyed the final 663 anti-vehicle mines.

The overall clearance outputs of 2020 saw a significant increase compared to 2019 when $13,976m^2$ was cleared

and 106 anti-personnel mines destroyed. The increase is attributed to the intensive mechanical clearance of the Israeli anti-personnel minefield at the Baptism Site.

The HALO Trust commenced clearance of the West Bank minefield at Qaser al-Yahud (the Baptism Site Project), in the Jordan Valley, in March 2018,⁵⁰ with both funding from international donors and Israel.⁵¹ The project aimed to remove mines and explosive ordnance in the area of the Baptism Site, which covers a total estimated area of 870,000m².⁵² Approximately 90,000m² was thought to potentially contain anti-personnel mines, including those of an improvised nature.⁵³ IDF minefield records provided to The HALO Trust separate the land for clearance outside the church compounds into eleven areas, all of which contain a potential UXO threat. Six of the eleven areas were known to contain significant numbers of M15 anti-vehicle mines in multiple lines and more than 2,600 anti-vehicle mines in total. The land and buildings inside the seven church compounds are suspected to contain mines and booby-traps, but no official records exist regarding this contamination.54

HALO Trust completed clearance of the seven churchyards and their compound buildings at the Baptism Site by mid-July 2019,⁵⁵ and completed the clearance of the Baptism Site project in April 2020.⁵⁶

ARTICLE 5 DEADLINE AND COMPLIANCE

APMBC ENTRY INTO FORCE FOR PALESTINE: 1 JUNE 2018

ORIGINAL ARTICLE 5 DEADLINE: 1 JUNE 2028

NOT ON TRACK TO MEET ARTICLE 5 DEADLINE. COMPLETION IS CONTINGENT ON POLITICAL FACTORS, AVAILABILITY OF FUNDS, AND DEMINING PROGRESS MADE BY ISRAEL AND THE HALO TRUST, AS PALESTINE DOES NOT HAVE CONTROL OF MINED AREAS UNDER ITS JURISDICTION.

LIKELIHOOD OF COMPLETING CLEARANCE BY 2025 (OSLO ACTION PLAN COMMITMENT): LOW

Clearance in the West Bank is constrained by available funding,⁵⁷ and is impacted by political factors, including the lack of authorisation granted by Israel for Palestine to conduct mine clearance operations.⁵⁸

It is, however, a positive development that The HALO Trust was permitted to begin mine clearance operations in April 2014, and, as at the end of 2020, HALO had completed clearance of six minefields in Area C of the West Bank.⁵⁹ As at the end of 2020, three Jordanian-laid minefields in the governorates of Jenin and Tulkarem, which fall within HALO Trust's donor agreement, remained to be cleared. Funds permitting, HALO plans to complete clearance of the last three priority minefields Qabatiya, Yabad, and the remaining mined area of Nur a-Shams in 2021. HALO requires 17 months of operations to complete these three tasks. As at May 2021, however, funds had yet to be secured and HALO expected that the target date to clear these minefields will be delayed.⁶⁰ PMAC reported that concluding clearance by the 2025 deadline is highly dependent on the facilitation of the Israeli authorities and the availability of funds.⁶¹

The COVID-19 pandemic did not affect HALO's operations at the Baptism Site Project, but since 24 April 2020 operations had been suspended due to the lack of funding for QA in the Nur a-Shams minefield. HALO could only acquire the funds and resume its clearance for a three-month period (23 September to 3 December 2020).⁶² PMAC reported that the COVID-19 impeded progress in technical and technical survey during 2020.⁶³

After completion of the three priority Jordanian-laid minefields, HALO Trust plans to look into clearance of certain mined areas in the Jordan Valley, a third of which are Israeli-laid.⁶⁴

In February 2019, INMAA hoped that clearance of mined areas in the West Bank would be finished in two years. According to INMAA, the Yalo and Canada Park minefields will both be cleared, but according to humanitarian prioritisation, noting that the minefields are fenced and marked, and claiming that they have little humanitarian impact.⁶⁵ As at April 2021, clearance in these minefields had not yet started. Furthermore, INMAA began survey of the Jordan Valley minefields in the West Bank in 2017, using Israeli national budget and operating with Israeli companies. INMAA sees significant potential for cancellation and reduction of land in the Jordan Valley, and is using various technologies and scientific tools to assess the likelihood of mine drift. INMAA planned to invest around ILS 900,000 (approximately US\$250,000) on this project in 2017–19.⁶⁶

Table 3: Five-year summary of AP mine clearance

Year	Area cleared (m ²)
2020	18,269
2019	13,976
2018	5,221
2017	41,857
2016	34,057
Totals	113,380

- 1 Palestine Initial Article 7 Report, dated 26 November 2018, Form D and Annex 2.
- 2 Ibid., Form D.
- 3 Emails from Tom Meredith, Desk Officer, HALO Trust, 24 June and 23 October 2015; and Sonia Pezier, Junior Programme Officer, United Nations Mine Action Service (UNMAS), 14 April 2015; and Ronen Shimoni, Programme Manager, HALO Trust, 13 June 2021.
- 4 Email from Ronen Shimoni, HALO Trust, 13 June 2021.
- 5 Email from Soula Kreitem, Programme Support Officer, UNMAS, 30 June 2021.
- 6 Emails from Ronen Shimoni, HALO Trust, 21 September 2019 and 20 April 2020.
- 7 Email from Ronen Shimoni, HALO Trust, 23 April 2021.
- 8 Email from Ronen Shimoni, HALO Trust, 20 April 2020.
- 9 Ibid.
- 10 Email from Celine Francois, Programme Officer, UNMAS Jerusalem, 5 July 2012.
- 11 Ibid.; and "UNMAS 2013 Annual Report".
- 12 Email from Soula Kreitem, UNMAS, 30 June 2021.
- 13 Emails from Maj. Wala Jarrar, External and Internal Relations Officer, PMAC, 13 May 2020; and Ronen Shimoni, HALO Trust, 23 April 2021.
- 14 Minister of Interior Decision No. 69, 25 March 2012.
- 15 Emails from Celine Francois, UNMAS Jerusalem, 19 July 2012; and Imad Mohareb, Planning Department, PMAC, 31 March 2013.
- 16 Emails from Celine Francois, UNMAS Jerusalem, 5 and 19 July 2012; and UN, "2012 Portfolio of Mine Action Projects", New York, 2013.
- 17 Email from the Planning Department, PMAC, 9 May 2016.
- 18 Statement of Palestine, 15th Meeting of States Parties, Santiago, 29 November 2016.
- Statement of Palestine, Fourth APMBC Review Conference, Oslo, 25 November 2019; and email from Wala Jarrar, PMAC, 12 May 2021.
- 20 Initial APMBC Article 7 Report, Form A, 26 November 2018
- 21 Email from Wala Jarrar, PMAC, 13 May 2021.
- 22 Initial Article 7 Report, Form D, 26 November 2018.

and email from Wala Jarrar, PMAC, 24 May 2020.

- 23 Email from staff member in the Planning Department, PMAC, 26 June 2018.
- 24 Interview with Brig. Osama Abu Hananeh, PMAC, Geneva, 7 February 2019;
- 25 Initial Article 7 Report, Form D, 26 November 2018; interview with Brig. Osama Abu Hananeh, PMAC, Geneva, 7 February 2019; and email from Soula Kreitem, UNMAS, 30 June 2021.
- 26 Email from Soula Kreitem, UNMAS, 30 June 2021.
- 27 Email from Ronen Shimoni, HALO Trust, 23 April 2021.
- 28 Email from Wala Jarrar, PMAC, 24 May 2020.
- 29 Email from Wala Jarrar, PMAC, 12 May 2021.
- 30 Emails from Ronen Shimoni, HALO Trust, 23 April and 13 June 2021.
- 31 Email from staff member in the Planning Department, PMAC, 30 August 2018.
- 32 Emails from Ronen Shimoni, HALO Trust, 3 Sept 2018 and 18 June 2020.

- 33 Initial Article 7 Report, Form D, 26 November 2018
- 34 Article 7 Reports submitted in 2019 (covering 2018), and 2020 (covering 2019).
- 35 Palestine's Article 7 report covering 2017 indicated that the strategic plan covers 2017-2022. It is not clear whether Palestine's strategic plan expired in 2020 or is valid until 2022.
- 36 PMAC, "Strategic Plan 2017–2020", undated.
- 37 Email from Wala Jarrar, PMAC, 24 May 2020.
- 38 Email from Ronen Shimoni, HALO Trust, 18 June 2020.
- 39 Email from Ronen Shimoni, HALO Trust, 14 May 2018.
- 40 Email from Ronen Shimoni, HALO Trust, 23 April 2021.
- 41 Emails from Ronen Shimoni, HALO Trust, 14 May 2018 and 23 April 2021.
- 42 Email from Ronen Shimoni, HALO Trust, 10 April 2019.
- 43 Email from Ronen Shimoni, HALO Trust, 23 April 2021.
- 44 Ibid
- 45 Emails from staff member in the Planning Department, PMAC, 9 May 2016; and Ronen Shimoni, HALO Trust, 14 June 2020.
- 46 Email from Ronen Shimoni, HALO Trust, 23 April 2021.
- 47 Emails from Wala Jarrar, PMAC, 12 May 2021; and email from Ronen Shimoni, HALO Trust, 23 April 2021.
- 48 Email from Ronen Shimoni, HALO Trust, 23 April 2021.
- 49 Ibid.
- 50 Emails from Ronen Shimoni, HALO Trust, 14 May 2018; and Michael Heiman, formerly of INMAA, 26 May 2018; and Israel CCW Amended Protocol II Article 13 Report (covering 2018), Form B.
- 51 Interview with Marcel Aviv, INMAA, Geneva, 7 February 2019.
- 52 Email from Ronen Shimoni, HALO Trust, 14 May 2018.
- 53 Email from Michael Heiman, formerly of INMAA, 26 May 2018.
- 54 Email from Ronen Shimoni, HALO Trust, 14 May 2018; and telephone interview, 23 August 2018.
- 55 Email from Ronen Shimoni, HALO Trust, 20 April 2020; and Israel CCW Amended Protocol II Article 13 Report (covering 2019), Form B.
- 56 Email from Ronen Shimoni, HALO Trust, 23 April 2021; and Israel CCW Amended Protocol II Article 13 Report (covering 2020), Form B.
- 57 Email from Ronen Shimoni, HALO Trust, 21 August 2019.
- 58 Initial Article 7 Report, Form D, 26 November 2018; and interview with Brigadier Osama Abu Hananeh, PMAC, in Geneva, 7 February 2019.
- 59 Emails from Ronen Shimoni, HALO Trust, 20 April 2020; and Wala Jarrar, PMAC, 12 May 2021.
- 60 Email from Ronen Shimoni, HALO Trust, 23 April 2021.
- 61 Email from Wala Jarrar, PMAC, 12 May 2021.
- 62 Email from Ronen Shimoni, HALO Trust, 23 April 2021.
- 63 Email from Wala Jarrar, PMAC, 12 May 2021.
- 64 Emails from Ronen Shimoni, HALO Trust, 22 April 2017, 14 May 2018 and 18 June 2020; and telephone interview, 3 August 2017.
- 65 Interview with Marcel Aviv, INMAA, in Geneva, 7 February 2019.
- 66 Interview with Michael Heiman, INMAA, in Geneva, 15 February 2018; and emails, 23 July and 10 August 2017; and, after leaving INMAA, 26 May 2018.