



Human Rights Now Calls on States to Act Urgently to End Israel's Genocide Against the Palestinian People and its Illegal Occupation of Palestinian Territory

With Israel escalating its war of annihilation in Gaza, and the deadline set by the United Nations General Assembly for Israel to end its occupation of Palestinian territory now passed, Human Rights Now (HRN) expresses its continuing outrage at the conduct of the Israeli government and military and once again calls on states to take effective individual and collective action to end Israel's ongoing, egregious violations of international law and protect the Palestinian people, as a matter of the greatest urgency.

1. Israel's international legal obligations toward the Palestinian people

On 26 January 2024, the International Court of Justice (ICJ) issued provisional measures against Israel in the *South Africa v. Israel* case, ordering Israel to prevent genocide in Gaza and ensure the provision of humanitarian assistance to the Gazan population.¹ These measures were subsequently reaffirmed in March² and May³ 2024. Later that same year, on 19 July, the ICJ issued an advisory opinion on the legal consequences arising from the policies and practices of Israel in the Occupied Palestinian Territory, including East Jerusalem ("OPT"). The advisory opinion confirmed the illegality of Israel's occupation, finding that Israel's continued presence in the OPT violates the prohibition of the acquisition of territory by force and the Palestinian people's right to self-determination, and must end as rapidly as possible.⁴

The findings of the ICJ were subsequently affirmed in a resolution adopted on 18 September 2024 by a large majority of states⁵ in the United Nations General Assembly. The resolution demanded, in accordance with the findings in the advisory opinion, that Israel end its presence in the OPT without delay, and no later than 12 months from the date of adoption of the resolution, and comply with all of its other legal obligations under international law, including those set out in the advisory opinion. These obligations include ceasing all new settlement activity in the OPT, making reparation for damage

¹ <https://www.icj-cij.org/sites/default/files/case-related/192/192-20240126-ord-01-00-en.pdf>, para. 86.

² <https://www.icj-cij.org/sites/default/files/case-related/192/192-20240328-ord-01-00-en.pdf>, para. 51.

³ <https://www.icj-cij.org/sites/default/files/case-related/192/192-20240524-ord-01-00-en.pdf>, para. 57.

⁴ <https://www.icj-cij.org/sites/default/files/case-related/186/186-20240719-adv-01-00-en.pdf>, paras 261-262, 267.

⁵ <https://digitallibrary.un.org/record/4061432?ln=en>.



caused to all natural and legal persons as a result of the occupation, and complying with the provisional orders issued by the ICJ in the *South Africa v. Israel* case.⁶

Far from complying with its legal obligations, however, Israel has continued its campaign of genocide in Gaza and further entrenched its presence in the OPT.

2. Israel continues to perpetrate genocide against the Palestinian people in Gaza

Since 7 October 2023, Israel's military assault on Gaza has killed at least 65,062 Palestinians and injured at least 165,697 more, the majority women and children.⁷ This death toll does not include bodies still buried under the rubble, which are estimated to be at least 11,000,⁸ or deaths from disease, hunger and lack of water (caused by Israel's destruction of the healthcare system, severe restrictions on medical evacuations out of Gaza, and blocking of humanitarian aid), which are estimated to equal the number of deaths from direct military violence.⁹ Famine was declared in Gaza Governorate in August 2025, with conditions in North Gaza Governorate estimated to be as severe or even worse, and famine conditions projected to spread to other locations in Gaza by the end of September.¹⁰ The physical infrastructure of Gaza lies in ruins, with 78% of all structures destroyed or damaged, 77% of the road network damaged, more than 90% of housing units destroyed or damaged, 89% of water and sanitation assets destroyed or damaged, and over 90% of schools requiring full reconstruction or major rehabilitation to be functional again.¹¹

Israel's conduct in Gaza has been legally categorized as genocide by human rights organizations,¹² scholars,¹³ and UN special rapporteurs and investigatory bodies.¹⁴ Most

⁶ A/RES/ES-10/24, paras. 2-3.

⁷ <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-17-september-2025>.

⁸ <https://news.un.org/en/story/2025/04/1162491>.

⁹ https://www.lemonde.fr/en/international/article/2025/09/07/gaza-s-horri-fying-death-toll-does-not-include-indirect-victims-of-israel-s-offensive_6745121_4.html.

¹⁰ <https://www.ipcinfo.org/ipcinfo-website/countries-in-focus-archive/issue-134/en/>.

¹¹ <https://www.ochaopt.org/content/reported-impact-snapshot-gaza-strip-17-september-2025>.

¹² <https://www.amnesty.org/en/documents/mde15/8668/2024/en/>;
<https://www.hrw.org/report/2024/12/19/extermination-and-acts-genocide/israel-deliberately-depriving-palestinians-gaza>; https://www.btselem.org/publications/202507_our_genocide;
<https://www.phr.org.il/en/genocide-in-gaza-eng/?pr=10907>.

¹³ Interview with William Schabas: <https://youtu.be/1s4LKr3qK4M?si=tcZt0IdEWN5t7mzi>

(42:55–43:50); Resolution by the International Association of Genocide Scholars:

<https://genocidescholars.org/wp-content/uploads/2025/08/IAGS-Resolution-on-Gaza-FINAL.pdf>.

¹⁴ Report by the UN Special Rapporteur on the situation of human rights in the Palestinian Territory occupied since 1967, Francesca Albanese:



recently, the Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel, established by the United Nations Human Rights Council in 2021, came to the same conclusion, in a report issued on 16 September 2025¹⁵ after almost two years of painstaking investigation in which it documented more than 16,000 pieces of evidentiary material.¹⁶ The report describes the horrors inflicted by Israel on the Palestinian people in Gaza in great detail, including: the direct targeting of civilians during evacuations, in “safe” zones and when seeking aid from the Israeli and US-backed Gaza Humanitarian Foundation; the direct targeting of medical personnel, journalists and humanitarian workers; the severe mistreatment (including sexual and gender-based violence) of detainees; the destruction and denial of access to medical facilities; the grave impact of repeated forced displacement; the blocking of humanitarian aid, electricity, water and fuel supplies; and the deliberate destruction of an IVF clinic (destroying all the reproductive material that was stored there for future conception of Palestinians). In the report the Commission concludes that the state of Israel is responsible for failing to prevent genocide, committing genocide and failing to punish genocide against the Palestinian people in Gaza. With regard to the commission of genocide, it finds that

the Israeli authorities and Israeli security forces have committed and are continuing to commit the following actus reus of genocide against the Palestinians in the Gaza Strip, namely (i) killing members of the group; (ii) causing serious bodily or mental harm to members of the group; (iii) deliberately inflicting on the group conditions of life calculated to bring about its physical destruction in whole or in part; and (iv) imposing measures intended to prevent births within the group.

It also finds that “the Israeli authorities and Israeli security forces have had and continue to have the genocidal intent to destroy, in whole or in part, the Palestinians in the Gaza Strip,” based both on direct evidence (statements made by Israeli authorities) and circumstantial evidence (a pattern of conduct from which genocidal intent was the only reasonable inference that could be drawn). The Commission also finds Israeli President Isaac Herzog, Prime Minister Benjamin Netanyahu, and former Defence Minister Yoav Gallant individually liable for direct and public incitement to commit genocide. Further,

<https://documents.un.org/doc/undoc/gen/n24/279/68/pdf/n2427968.pdf>; Interview with the UN Special Rapporteur on the right to food, Michael Fakhri: <https://www.theguardian.com/world/2025/aug/04/gaza-starvation-un-expert-michael-fakhri>; Report by the UN Special Committee to Investigate Israeli Practices Affecting the Human Rights of the Palestinian People and Other Arabs of the Occupied Territories: <https://documents.un.org/doc/undoc/gen/n24/271/19/pdf/n2427119.pdf>.

¹⁵ <https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session60/advance-version/a-hrc-60-crp-3.pdf>.

¹⁶ <https://www.youtube.com/watch?v=trUcK8hHaIA> (4:40~5:02).



it sounds the alarm on the situation in the West Bank, raising “the serious concern that the specific intent to destroy the Palestinians as a whole has extended to the rest of the occupied Palestinian territory, that is, the West Bank, including East Jerusalem, based on Israeli authorities’ and Israeli security forces’ actions therein.”¹⁷

3. Israel continues to entrench and expand its illegal occupation of Palestinian territory

The expansion of illegal settlements in the West Bank continues apace, with an Israeli defence ministry committee approving a settlement project in August 2025 that would “effectively cut off the occupied West Bank from East Jerusalem and divide the territory in two” and “put an end to hopes for a viable, contiguous Palestinian state.”¹⁸ After signing an agreement to officially move ahead with this project on 11 September, Israeli Prime Minister Benjamin Netanyahu declared: “We are going to fulfil our promise that there will be no Palestinian state. This place belongs to us.”¹⁹ Moves toward *de jure* annexation of the West Bank, also an illegal act, are also gaining momentum, with a large majority of the Israeli parliament voting in favor of a symbolic motion calling for the annexation of the West Bank on 23 July 2025,²⁰ and Israeli Finance Minister Bezalel Smotrich proposing a plan to annex 82% of the territory in early September.²¹

On August 7, the Israeli security cabinet approved a plan to directly occupy Gaza City, in a possible prelude to directly occupying all of Gaza²² (as Smotrich and National Security Minister Itamar Ben Gvir have repeatedly called for²³), and on 16 September Israel launched a ground offensive against the city, following several weeks of intensive bombing in which it “systematically destroyed the urban infrastructure” of the city,

¹⁷ <https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session60/advance-version/a-hrc-60-crp-3.pdf>, paras. 251-255.

¹⁸ <https://www.bbc.com/news/articles/cvg30l6myj3o>.

¹⁹ <https://www.aljazeera.com/news/2025/9/11/israels-netanyahu-says-there-will-be-no-palestinian-state>.

²⁰ <https://www.aljazeera.com/news/2025/7/23/israeli-parliament-approves-symbolic-motion-on-west-bank-annexation>.

²¹ <https://www.haaretz.com/israel-news/2025-09-04/ty-article/.premium/smotrich-isnt-bluffing-israeli-ministers-plan-to-annex-82-of-west-bank-is-a-road-map/00000199-150e-dd6c-afdb-7d4febbe0000>.

²² <https://www.nytimes.com/2025/08/07/world/middleeast/israel-gaza-military-offensive.html>; <https://theconversation.com/israels-plans-for-a-full-occupation-of-gaza-would-pave-the-way-for-israeli-resettlement-262723>.

²³ <https://www.timesofisrael.com/smotrich-signals-he-wont-bolt-coalition-despite-objecting-to-gaza-humanitarian-aid/>; <https://www.nytimes.com/2025/07/29/world/middleeast/israel-gaza-jewish-resettlement.html>.



pulverising “[t]owers, housing apartments, local institutions, schools and mosques”²⁴ and killing and terrorizing the population. Residents have been ordered to leave the city and move to the south, although many are unable to leave or refuse to leave because they are aware that the so-called “humanitarian area” designated for them in the south does not have “adequate shelter, food, water, sanitation or health services” and is itself “being attacked constantly” by Israel.²⁵ The UN Human Rights Office in the occupied Palestinian territory stated that

[i]n light of the Israeli military’s pattern of reducing many of Gaza’s urban areas to unlivable rubble, including through the systematic demolition of residential buildings in North Gaza, Rafah and now parts of Gaza City, the widespread forced displacement of Gaza City’s population risks becoming permanent by turning these areas into an uninhabitable wasteland.²⁶

Israel has forcibly displaced and concentrated the Palestinian population of Gaza into ever smaller areas of land, with 88% of Gaza’s territory now designated as Israeli military zones or under evacuation orders.²⁷ In early July Israel’s defence minister, Israel Katz, announced plans to construct a “humanitarian city” (later described as a “concentration camp” by former Israeli Prime Minister Ehud Olmert²⁸) atop the ruins of Rafah, which would eventually house the entire population of Gaza. Once inside, Palestinians would not be able to leave.²⁹ The move was reportedly “endorsed by Prime Minister Benjamin Netanyahu as part of a broader plan to ‘encourage emigration’ from Gaza.”³⁰

4. The obligation of states to act to end Israel’s genocide and its illegal occupation of Palestinian territory

The key reason that Israel has continued to carry out such serious violations of peremptory norms of international law is that states have failed to fulfill their legal responsibility to act, individually or collectively, to end these violations, or in some cases they have

²⁴ https://www.lemonde.fr/en/international/article/2025/09/17/in-gaza-city-systematically-destroyed-by-israel-residents-fear-they-may-never-return_6745479_4.html?random=592413945.

²⁵ <https://gisha.org/en/israels-declaration-of-a-new-humanitarian-area-en/>.

²⁶ <https://reliefweb.int/attachments/f82e1a3e-c03e-4aa5-bb35-b3d196a5c580/2025-09-10%20one%20month%20from%208%20August.pdf>.

²⁷ <https://reliefweb.int/report/occupied-palestinian-territory/humanitarian-response-report-august-2025>.

²⁸ <https://www.theguardian.com/world/2025/jul/13/israel-humanitarian-city-rafah-gaza-camp-ehud-olmert>.

²⁹ <https://www.haaretz.com/israel-news/2025-07-07/ty-article/.premium/defense-minister-israel-to-concentrate-all-gaza-population-in-rafah-humanitarian-zone/00000197-e56a-d1ad-ab97-e5ef764e0000>.

³⁰ <https://www.justsecurity.org/116904/israeli-international-law-scholars-gaza/>.



facilitated them by continuing to provide Israel with weapons and diplomatic support. Under the 1948 Genocide Convention states have an obligation to prevent genocide, and this duty also exists under customary international law, meaning that even non-party states must act to prevent genocide.³¹ In the present situation the duty to prevent genocide has been engaged at the very least since the ICJ ordered its first provisional measures against Israel on 26 January 2024.

With regard to Israel's illegal occupation of the OPT, the July 2024 ICJ advisory opinion and the September 2024 General Assembly resolution set out a number of specific obligations for states, including:

- the obligation to promote, through joint and separate action, the realization of the right of the Palestinian people to self-determination;
- the obligation to take lawful measures to ensure that any impediment resulting from the illegal presence of Israel in the OPT to the exercise of the Palestinian people of its right to self-determination is brought to an end;
- the obligation not to render aid or assistance in maintaining the occupation, and to take steps to ensure that their nationals, and companies and entities under their jurisdiction, do not provide such aid or assistance;
- the obligation to abstain from entering into economic or trade dealings with Israel concerning the OPT or parts thereof which may entrench its unlawful presence in the Territory;
- the obligation to take steps to prevent trade or investment relations that assist in the maintenance of the occupation;
- the obligation to take steps towards ceasing the importation of any products originating in the Israeli settlements, as well as the provision or transfer of arms, munitions and related equipment to Israel, in all cases where there are reasonable grounds to suspect that they may be used in the OPT;
- the obligation to implement sanctions, including travel bans and asset freezes, against natural and legal persons engaged in the maintenance of the occupation; and
- the obligation to support accountability efforts for all victims.

Although some states have taken certain concrete steps toward fulfilling the above

³¹ <https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session60/advance-version/a-hrc-60-crp-3.pdf>, para. 246.



obligations,³² they remain an exception, and more action is urgently required by all states, both jointly and separately. On 10 September 2025 the UN General Assembly adopted a resolution endorsing the “New York Declaration,” the outcome document of the High-level International Conference for the Peaceful Settlement of the Question of Palestine and the Implementation of the Two-State Solution, which was held in New York July 28~30, 2025. This has raised hopes with regard to collective action by states, as the outcome document is intended to serve as an action plan “to urgently chart an irreversible pathway towards the peaceful settlement of the question of Palestine and the implementation of the two-State solution.”³³ However, the approach set out in the document is not sufficiently robust and does not sufficiently reflect the relevant norms of international law, which should form the parameters of the debate.

Firstly, the document contains no concrete proposals for stopping Israel’s genocide, despite the clear obligation under international law for states to prevent genocide and their obligation (set out in the July 2024 ICJ advisory opinion and the September 2024 General Assembly resolution) to take lawful measures to ensure that any impediment resulting from the illegal presence of Israel in the OPT to the exercise of the Palestinian people of its right to self-determination is brought to an end. There can be no greater impediment to the exercise of self-determination by a people than to be subject to a campaign of genocide intended to prevent the very exercise of that self-determination. The document demands that “ Hamas must end its rule in Gaza and hand over its weapons to the Palestinian Authority, with international engagement and support, in line with the objective of a sovereign and independent Palestinian State” (in other words, Hamas must disarm even before a Palestinian state becomes a reality in a practical sense), but does not demand the disarmament of Israeli settlers or propose any realistic steps, such as an arms embargo, for preventing the Israeli military from continuing to destroy the Palestinian people. It does support the deployment of a “temporary international stabilization mission” upon the invitation of the Palestinian Authority, mandated by the UN Security Council, one of whose tasks would be to provide protection to the Palestinian civilian population, but there is no prospect of any such mission actually being established as the United States would certainly use its veto in the Security Council to block it, with its determination to block any effective action demonstrated once again on 18 September 2025, when it

³² For example, at an emergency conference of states convened by the Hague Group of states in July 2025, 13 states committed to a set of diplomatic, legal and economic measures as a means of implementing, among others, the July 2024 ICJ advisory opinion and the September 2024 General Assembly resolution. <https://thehaguegroup.org/meetings-bogota-en/>.

³³ A/80/L.1/Rev.1.



blocked a Security Council resolution calling for a ceasefire.³⁴

Secondly, the document contains no demand for Israel to withdraw immediately from the OPT, despite Israel's obligation to do so under international law and the clear deadline for withdrawal, now passed, that was adopted by the General Assembly in its 18 September 2024 resolution. In fact, "the framework to which the signatories have committed reflects the same strategy that Arab and Western states and the EU have pursued for decades: pressure the Palestinians to negotiate and end the armed struggle against the occupation in return for international efforts that promise to bring about the so-called two-state solution."³⁵ Particularly after Israel's attack on Qatar on 9 September 2025, in which it attempted to kill senior leaders of Hamas engaged in ceasefire negotiations, it is crystal clear that Israel has no interest in pursuing a negotiated settlement,³⁶ and concrete collective measures with a realistic chance of ensuring its compliance must be adopted.

Thirdly, the document ignores Israel's obligation to provide reparations to Palestine. It assumes that states, the UN and international organizations will be the ones to fund the reconstruction of Gaza, and the question of redressing the harm caused by the Israeli occupation in the West Bank (including East Jerusalem) is not referred to at all.

5. Recommendations

The General Assembly's 18 September 2024 resolution expressed the determination "to examine further practical ways and means to secure the full respect of the advisory opinion and the full implementation of all relevant United Nations resolutions, notably in case of non-compliance." Israel's non-compliance could not be clearer, and at this point, states must realize the urgent necessity of fulfilling their legal responsibilities and taking measures that are commensurate with the severe gravity of the situation and have a realistic chance of having an impact on the ground. This is essential not only to protect the lives, well-being and right to self-determination of the Palestinian people, but also to prevent international law itself from being further undermined.

³⁴ <https://news.un.org/en/story/2025/09/1165881>.

³⁵ <https://arabcenterdc.org/resource/the-new-york-declaration-on-the-two-state-solution-more-empty-promises/>.

³⁶ <https://www.cbsnews.com/news/israel-qatar-attack-fallout-netanyahu-trump-hamas-war-gaza/>;
<https://www.dropsitenews.com/p/exclusive-gaza-ceasefire-proposal-trump-hamas-israel>.



HRN expresses grave concern at the lack of effective action by most states to address Israel's ongoing violations of international law and the active complicity of some states in these violations. It calls on all states to:

- Immediately impose a complete two-way arms embargo on Israel and cease any form of military aid or assistance to Israel. “[G]iven that it is the military presence in the OPT, in and of itself, that is unlawful, the ban has to cover all elements of aid that supports the Israeli military, not just aid covering matters such as arms that can be and are being used to perpetrate violations of international humanitarian law.”³⁷
- Impose a complete two-way trade, finance and investment embargo on Israel, including but not limited to an embargo of products from settlements, in order to fulfill the obligation to abstain from entering into economic or trade dealings with Israel concerning the OPT which may entrench its unlawful presence in the territory. “Given how the economic dimensions of the Israeli presence in the OPT are inextricably linked to the Israeli economy generally, all economic and trade dealings with Israel ‘concern’, one way or another, all or parts of the OPT, and all such dealings ‘may’ entrench the presence”;³⁸ the embargo must therefore be complete, not partial.
- Support accountability measures against Israeli officials for war crimes, crimes against humanity, and genocide.

HRN calls on the Japanese government specifically to:

- Cancel its plan to purchase Israeli drones.
- Instruct the Government Pension Investment Fund to divest from Israeli national bonds, Israeli banks, Israeli weapons manufacturers and foreign companies that supply equipment to the Israeli military, in particular the US firm Caterpillar.
- Provide greater support to the International Criminal Court (ICC) as a part of supporting accountability efforts for all victims, including by abstaining from any future involvement in events such as CyberTech Tokyo 2025, a conference endorsed by the Ministry of Economy, Trade and Industry that was held in Tokyo in September

³⁷ Ralph Wilde, “Illegality of Israel’s presence in the Palestinian Gaza Strip and West Bank, including East Jerusalem, in the light of the 2024 Occupied Palestinian Territory Advisory Opinion of the International Court of Justice, and consequences for third States and the European Union,” p. 5 (https://www.ucl.ac.uk/laws/sites/laws/files/ralph_wilde_icj_opt_ao_thirdstateseu_legal_opinion.pdf).

³⁸ *Id.*, p. 4.



2025.³⁹ This conference included speakers such as Yossi Cohen, the former director of Mossad, who reportedly carried out a campaign of intimidation against the ICC, including direct threats against then-Chief Prosecutor Fatou Bensouda, in an effort to stop the court investigating Israel's crimes against Palestinians.⁴⁰

At the collective level, HRN calls on states to:

- Work for the adoption of a resolution at the UN General Assembly recommending the imposition of complete two-way arms and trade embargoes on Israel and the cessation of any form of military aid or assistance to Israel.
- Work for the adoption of a resolution at the UN General Assembly under the “Uniting for Peace” procedure⁴¹ recommending that a multinational UN protection force⁴² be sent to Gaza to protect Palestinians (as called for by UN experts⁴³). Legally, this would require the consent of the State of Palestine (which has already indicated its desire for the Security Council to mandate such a force⁴⁴) but not that of Israel, as Israel is illegally occupying Gaza and the West Bank and therefore has no right to exercise any kind of authority in this territory.
- Work for the adoption of a resolution at the UN General Assembly under the “Uniting for Peace” procedure rejecting Israel's credentials to participate in the UN General Assembly on the basis of Israel having violated its obligations under the UN Charter.

³⁹ <https://tokyo.cybertechconference.com/>.

⁴⁰ <https://www.theguardian.com/world/article/2024/may/28/israeli-spy-chief-icc-prosecutor-war-crimes-inquiry>.

⁴¹ A/RES/377 (V).

⁴² The General Assembly has previously created such a force under “Uniting for Peace,” namely the United Nations Emergency Force (UNEF) in 1956:

<https://peacekeeping.un.org/mission/past/unef1backgr1.html>.

⁴³ <https://www.ohchr.org/en/press-releases/2025/09/gaza-un-experts-urge-general-assembly-respond-famine-and-genocide>.

⁴⁴ A/ES-10/1043-S/2025/529, p. 1 (<https://docs.un.org/en/A/ES-10/1043?direct=true>).