



INDEPENDENT
COMMISSION
FOR HUMAN RIGHTS

Fact sheet

On the Gaza Humanitarian Foundation and Militarization of Relief

2025

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1. Introduction

In armed conflicts, humanitarian aid is one of the most sensitive issues in the contemporary international system, as it is directly associated with saving lives and protecting civilians under extremely harsh conditions. This factsheet examines the case of the Gaza Humanitarian Foundation (GHF) as a controversial applied model that highlights the overlap between humanitarian action and military and political agendas. It also explores consequent grave violations of the fundamental principles of humanitarian work.

This factsheet seeks to shed light on the GHF experience in managing and distributing aid within the Gaza Strip as a controversial model in the international humanitarian landscape. This significant study opens discussion on one of the most serious contemporary phenomena; that is, the militarization of humanitarian action and transformation of aid into a tool of military and political pressure. This practice runs counter to the fundamental principles of humanitarian work, namely, neutrality, independence, integrity, and humanity. This factsheet not only documents and analyzes the ongoing experience, but also raises pivotal questions. How can humanitarian aid shift from a tool of protection to one of coercion and political control? What risks does the GHF model reveal for the future of the international humanitarian system? Further, the factsheet attempts to analyze the GHF establishment, development, and circumstances of operations in Gaza. In addition to a comparison with applicable international standards, it evaluates the aid distribution mechanisms the GHF adopts. It draws a link between the proposed model and the concept of “militarization of relief” as it appears in the literature of the United Nations (UN) and human rights organizations. It also examines the legal and moral dimensions arising from this model, particularly in relation to the breach of International Humanitarian Law (IHL) and the Geneva Conventions. To this avail, the factsheet is underpinned by a review of relevant literature, monitoring, and field observation of how the GHF handles the distribution of humanitarian aid.

The factsheet concludes with a set of substantive findings. Most notably, the GHF model is Instead of responding to the needs of the Palestinian population, it reflects a state in which aid is being politicized and subjugated to serve interests of the Israeli occupying authorities. Findings also demonstrate that the distribution process, based in four militarily secured centers, has transformed aid into death traps, where thousands of people were killed and injured while attempting to access food. Comparative analyses further show that the GHF model explicitly contradicts the principles of the Montreux Document (2008) and IHL rules. While employing private security companies without transparency or accountability, this model turns hunger into a tool of collective coercion and forced displacement.

Premised on these findings, the factsheet presents a set of practical and legal recommendations. Most importantly, the role of the UN and its agencies must be restored as the sole legitimate authority for the distribution of humanitarian aid in Gaza. Humanitarian action should be separated from military agendas by establishing safe zones for distribution under neutral civilian supervision. While strengthening coordination with international partners, local Palestinian organizations will

be reintegrated because these are the most capable of outreach and response. An international investigation should be opened into the violations resulting from the GHF model, including the deaths that have been reported around distribution sites. The principle of universal jurisdiction should be put in place to hold perpetrators to account. International and political efforts need to be launched to reject recognition of the GHF as a legitimate humanitarian provider. The principles of the Montreux Document should be transformed into a binding legal framework to ensure the protection of civilians and prevent the militarization of relief.

This factsheet does not merely monitor and analyze the current status of the GHF, but also seeks to raise fundamental questions: How can the essence of humanitarian action be safeguarded from politicization and militarization? How can it be ensured that aid remains a tool for survival and protection, not a means of extortion and slow extermination amid the war of genocide against Gazans? The factsheet stresses that the GHF experience is not just an operational failure or institutional shortfall; rather, it reflects a dangerous approach that puts at risk the very essence of humanitarian action. Instead of ensuring that it is a refuge for the vulnerable, aid has turned into a deadly snare that aggravates the suffering of those under siege. Hence, this factsheet serves as a warning cry to the international community and humanitarian decision-makers, stressing the need to reclaim the constituent principles of humanitarian action and ensure that aid remains a tool of protection and dignity, not a means of slow extermination.

2. Background

The GHF was established in February 2025 in the State of Delaware, United States, as a non-profit organization under US and Israeli sponsorship, with the aim of “ensuring food security” for citizens in the Gaza Strip. As a US humanitarian and health assistance provider, the GHF focuses on emergency response to humanitarian needs and operates through protected distribution centers, known as secured distribution sites. The Foundation promises rapid distribution and maintenance of neutrality and independence, claiming to deliver assistance without collusion or diversion to armed groups in Gaza. It is active in areas of protracted conflict or crises such as the Gaza Strip. Registered in Geneva, a GHF affiliate was incorporated, but did not practically commence operations and was later closed. Earlier, the GHF was chaired by Chief Executive Officer Jake Wood, who resigned on May 25, 2025. It enjoys support from the Trump Administration and Israeli government. It has been criticized by the UN and humanitarian organizations for politicizing aid distribution. Established humanitarian actors stated that the GHF gave Israel cover to pursue its objectives of evacuating the Palestinian population from the Gaza Strip. Former GHF chair also questioned the Foundation’s neutrality.¹

¹ welt.de+15en.wikipedia.org+15time.com+15.

The GHF began operations in May 2025 after Israeli allegations that Hamas was diverting aid. However, Reuters reported that these claims were unsubstantiated.

The UN and other relief groups refused to cooperate with the GHF and accused it of politicizing, “weaponizing,” and delivering aid unsafely to the Palestinian people. Side by side with the UN, more than 170 charities and non-governmental organizations, including Save the Children and Oxfam, have censured the GHF for failing to adhere to the principles of humanitarian work and violating humanitarian norms. It has forced two million Palestinians into overcrowded and militarized areas and subjected those who seek aid to attacks almost every day. Against this background, these actors demand that the GHF be immediately shut down.

Of note, the GHF operates with a large operating budget compared to other international humanitarian organizations working in the region.

On June 26, 2025, the US Department of State announced approval of an immediate grant of US\$ 30 million to the GHF to support food distribution operations in Gaza, reflecting a key effort to accelerate the delivery of aid.²

In a press statement posted on the US Department of State website on June 26, 2025, the spokesperson stated that US\$ 30 million was approved to help fund the GHF.³ *Reuters* reported that the funding allocated to the GHF in 2025 ranged from US\$ 180 million to US\$ 500 million. The exact amount of funds depended on appropriations from the US Department of State and the funding cap provided through the United States Agency for International Development (USAID).⁴ In a letter to Secretary of State Marco Rubio, members of Congress expressed concern over several issues, including the fact that the GHF was private and lacked any experience in the field of humanitarian action. The US\$ 30 million funding was approved in spite of 58 internal objections. Members of Congress also voiced concern over the widespread violence at the GHF distribution sites. As of July 23, 2025, at least 1,000 people were killed while attempting to access aid. The GHF does not use traditional distribution methods aligned with international humanitarian principles.⁵

3. Terms and concepts

2 VG+15Gaza Humanitarian Foundation+15AP News+15

3 https://www.state.gov/briefings/department-press-briefing-june-26-2025?utm_source=chatgpt.com%20GHF.

4 <https://www.reuters.com/world/middle-east/us-backed-aid-group-proposed-human-transit-areas-palestinians-gaza-2025-07-07/>.

5 https://casten.house.gov/imo/media/doc/gaza_humanitarian_foundation_oversight_letter.pdf?utm_source=chatgpt.com.

3.1 UN definition of humanitarian assistance

In March 2003, the UN provided the definition of humanitarian assistance through the Inter-Agency Standing Committee (IASC).⁶ Accordingly, humanitarian assistance is “aid to an affected population, that seeks, as its primary purpose, to save lives and alleviate suffering of a crisis-affected population. Humanitarian assistance must be provided in accordance with the basic humanitarian principles of humanity, impartiality and neutrality.”⁷ Additionally, at its twenty-seventh session, the UN Human Rights Council defined humanitarian assistance as “aid delivered to a disaster-stricken population in a manner that complies with the core humanitarian principles of humanity, impartiality, and neutrality.” Based on the level of contact with the affected population, humanitarian assistance is categorized into direct assistance, indirect assistance, and support to infrastructure. Direct assistance involves face-to-face distribution of goods and services to the disaster-stricken population. Indirect assistance comprises aid with at least one degree of contact with the affected population and includes various activities, such as the transportation of relief goods or relief workers. Support to infrastructure entails the provision of public services such as road repairs, airspace management, power generation, etc.⁸

According to Article 54 of Additional Protocol I to the Geneva Conventions, IHL strictly prohibits the use of starvation as a method of warfare.⁹ Also, Article 14 of Additional Protocol II prohibits the attack, destruction, removal, or rendering unusable of objects indispensable to the survival of the civilian population, such as food supplies, agricultural areas, and water sources.

3.2 General concept of the militarization of aid

3.2.1 Militarization of aid as per OCHA understanding and guidelines

Militarization of humanitarian aid involves the use or delivery of aid through military tools or actors, undermining the core principles of humanitarian action, including neutrality and independence, and putting both civilians and humanitarian workers at risk. Along this vein, aid is exploited to achieve political or military objectives, integrated into combat operations, linked to the movements of armed forces, conditioned on submission to military or occupying authorities, or imposed by actors who lack neutrality and impartiality. This is in clear violation of the four fundamental principles of humanitarian assistance under IHL, namely, humanity, neutrality, independence, and impartiality. This definition derives from the principles maintained by the UN Office for the Coordination of Humanitarian Affairs (OCHA).

6 The IASC was established in 1992 in response to UN General Assembly Resolution A/RES/46/182 (1991), which calls for the strengthening of the coordination of humanitarian emergency assistance.

7 IASC, Guidelines on the Use of Military and Civil Defense Assets to Support United Nations Humanitarian Activities in Complex Emergencies, March 2003.

8 Kazem, Ali and Qasim Madi. (2016). “Humanitarian assistance: A study in light of International Humanitarian Law”. *Al-Muhaqqiq Al-Hilli Journal for Legal and Political Sciences*, (3), p. 364 (in Arabic).

9 <https://ihl-databases.icrc.org/en/ihl-treaties/api-1977/article-54>.

3.2.2 Features of aid militarization in the GHF model

1. Subjection to a non-neutral military authority

The GHF operates in line with a centralized distribution model within areas under direct Israeli security and military control.

According to reports from Médecins Sans Frontières (MSF), all four GHF distribution sites are secured by armed contractors and coordinated militarily with the Israeli army. Rather than safe humanitarian settings, these sites are considered “active combat zones,” transforming aid into tools of military and political pressure.¹⁰

2. Exclusion of UN agencies and local authorities

In a statement released on May 4, 2025, the UN Secretary-General and Emergency Relief Coordinator stated: “We will not participate in any scheme that does not adhere to the global humanitarian principles of humanity, impartiality, independence, and neutrality.” In the occupied Palestinian territory (oPt), the heads of all UN agencies and non-governmental organizations, under the Humanitarian Country Team, have unanimously affirmed this position. Humanitarian action responds to people’s needs, wherever they are.¹¹ According to their official statements, these actors refuse to cooperate with the GHF due to the exclusion of local expertise and breach of collective humanitarian work principles.

3. Use of private security and lack of transparency

The Montreux Document emphasizes the need for strict standards of transparency and accountability when contracting private security entities in conflict zones. This stands in contradiction to the alleged practices of the GHF model. These unveil clear shortcomings in coherent contracting, proper vetting and auditing mechanisms for contractors, external accountability procedures, transparent hiring systems, and standardized human rights training. Rather, documented cases have shown individual discretion and the excessive use of force.

3.2.3 Risks arising from the militarization of aid

1. Transforming aid into a tool of coercion

OCHA and MSF report that the distribution method forces civilians into overcrowded military zones, often under fire. This has led to deaths, injuries, and even unreported forced displacement toward fortified sites, contributing to demographic change.¹²

10 https://msf.org.uk/sites/default/files/2025-08/MSF-Gaza-ThisIsNotAid-FINAL.pdf?utm_source=chatgpt.com.

11 https://www.ochaopt.org/content/statement-humanitarian-country-team-occupied-palestinian-territory-principled-aid-delivery-gaza?utm_source=chatgpt.com.

12 https://www.unocha.org/publications/report/occupied-palestinian-territory/humanitarian-situation-update-292-gaza-strip?utm_source=chatgpt.com.

2. Creating a coercive environment that lacks protection

In a statement dated May 4, 2025, OCHA condemned the ongoing Israeli blockade on Gaza, which had lasted for nine weeks, causing severe famine and the complete shutdown of bakeries, community kitchens, and warehouses. OCHA rejected the aid distribution plan imposed by the Israeli army, considering that it was in contravention to humanitarian principles and pose a risk to civilians. OCHA called on world leaders to take urgent action to lift the blockade and allow immediate entry of supplies, emphasizing that civilians were forced to approach military zones to collect food rations, endangering the lives of people, including humanitarian workers, and intensifying forced displacement.¹³

3. Geographic discrimination and unequal access

Statements by Oxfam and CARE International indicate that the current GHF model excludes populations in northern Gaza and limits distribution to the south. Breaching the principle of equitable humanitarian access based on need rather than geographic location, this has resulted in overcrowding at distribution sites in southern Gaza.

3.2.4 Legal characterization of the GHF model

According to the UN humanitarian principles, the GHF model fails to uphold the principle of neutrality, ensure operational independence, and guarantee safe access. Legally, it is classified as a “violation of the IHL frameworks,” particularly in relation to:

- Article 14 of Additional Protocol II to the Geneva Conventions (prohibition of attacks on objects indispensable to the survival of the civilian population); and
- Article 54 of Additional Protocol I (prohibition of using starvation as a method of warfare).

3.2.5 The viewpoint of international institutions’ and proposed alternative

Organizations such as Oxfam, MSF, CARE International, and OCHA unanimously agree that the GHF is not a humanitarian model. Rather, it is a mechanism of political pressure that uses hunger to serve military objectives. The most appropriate alternative is to revert to distribution mechanisms managed by accredited UN agencies. These ensure universal and equitable access, actual protection of civilians, accountability, and transparency. It can be argued that the GHF aid distribution model in Gaza represents one of the clearest examples of the militarization of relief, as it entails:

1. Mixing humanitarian action with political agendas.

¹³ https://www.ochaopt.org/content/statement-humanitarian-country-team-occupied-palestinian-territory-principled-aid-delivery-gaza?utm_source=chatgpt.com.

2. Transforming aid centers into combat zones.
3. Using the starvation of civilians as a means of political pressure.

Consequently, the continuation of this model poses a direct threat to the entire international humanitarian system. It also undermines the principles of neutrality, work of humanitarian organizations, integrity, and human dignity.

4. The Montreux Document (2008): Background, content, and participating States

In recent decades, the role of private military and security companies (PMSCs) in armed conflicts has expanded significantly, raising international legal and moral concerns about their effect on global security and civilian protection. In response, Switzerland and the International Committee of the Red Cross (ICRC) adopted the Montreux Document in 2008 as a non-binding political and legal framework (soft law), which reaffirms States' responsibilities for regulating and overseeing PMSCs. The document lists three categories of States: Contracting States, Territorial States, and Home States. Combined, these bear full legal responsibility to ensure that these companies comply with IHL and human rights standards and that states do not evade responsibility by concluding contracts with private firms.¹⁴

The Montreux Document includes some 70 recommendations related to developing legislative frameworks, setting strict criteria for personnel selection and training, defining clear rules of engagement, promoting transparency and accountability, and enhancing international cooperation to prevent misuse of PMSCs. Although it is not legally binding, the document has received support from more than 58 States and international organizations, including the UN and NATO, reflecting broad acceptance of its principles. Switzerland continues to play a leading role in supporting implementation of the document through the Montreux Forum and complementary initiatives, such as the International Code of Conduct.¹⁵

The Montreux Document serves as a pioneering international standard for regulating the private security sector, paving the way for developing more binding legal frameworks in the future. It also highlights the importance of ongoing UN efforts to ensure civilian protection and accountability for violations in armed conflict.¹⁶

¹⁴ icrc.org.

¹⁵ icrc.org.

¹⁶ Abu Ajeeb, Liqaa. *Report on the Mechanisms and Means of Protecting Humanitarian Action Between Theory and Practice*, August 2014, p. 36.

5. Comparative analysis between the Montreux Document principles and GHF mechanism

5.1 Principle of international responsibility of the State/contracting entity

The Montreux Document affirms that the entity contracting PMSCs is responsible for the acts of these companies and cannot disclaim legal responsibility under the pretext of “privatization.” In the Palestinian case, the State of Palestine is under occupation. In other words, the governing authority has not contracted the GHF. Rather, the occupying Power is the party that contracted the Foundation.

Oftentimes, the GHF assigns certain security tasks to local private security entities or contracted individuals under exceptional circumstances (e.g., to protect aid convoys or GHF premises). However, written policies or clear contracts are not always in place to govern this relationship, allowing room for indirect evasion of responsibility in the event violations are committed. Deficiencies arise from the lack of effective oversight mechanisms or clear internal accountability pathways for the performance of these entities. This may be deemed to be a contravention of the general spirit of the Montreux Document and exposes the GHF to the risk of involvement in unlawful practices without accountability.

5.2 Standard for selecting and training security personnel

The Montreux Document recommends conducting rigorous vetting of security personnel backgrounds, refraining from employing those with records of violations, and IHL training.

In many instances, employment in the GHF is based on personal connections or carried out through expedited contracts without in-depth vetting of human rights records or legal qualification of security personnel.

The lack of clear, transparent employment policies or unified training for security personnel is in direct contradiction with the Montreux practices, particularly in sensitive contexts such as the complex Palestinian situation.

5.3 Rules of engagement and lawful use of force

The Montreux Document provides for the need for written and clear rules of engagement that define when and how force can be used, while showing respect for the principles of proportionality and necessity.

In the GHF case, “individual discretion” of guards or security personnel may be used in the absence of a clear protocol, increasing the likelihood of excessive use of force or misjudgment of situations. According to statistics of the Palestinian Ministry of Health (MoH), this is reflected on the ground by the rising numbers of dead and injured civilians at the GHF distribution sites.

Undocumented policies on engagement and use of force result in deliberate violations and place the GHF in a position of moral or legal accountability.

5.4 Transparency and accountability

The Montreux Document calls for strengthening transparency mechanisms (e.g., through periodic reporting, external monitoring, and public disclosure of contracts). Pursuant to agreed provisions, it also asserts that any entity that commits breaches be held to account.

On the other hand, GHF operations lack an independent accountability system or an internal review committee for security activities. In the event they are committed, violations are addressed internally without engaging stakeholders or victims. The principal reason lies in a poor internal oversight structure and absent transparency as to how security entities are contracted or the way they operate.

5.5 Nonbinding nature of the document versus local challenges

Although it is legally nonbinding, the Montreux Document carries significant political and moral weight, particularly in conflict zones. The document is supported by 58 States and international organizations such as the UN and NATO, reflecting broad acceptance of its principles. By contrast, the GHF operates in a setting without an effective judicial authority, under a crippling blockade, and with multiple security actors. Combined, these factors complicate actual compliance with nonbinding international standards. The GHF uses this pretext to justify its failure to rely on the provisions and spirit of the Montreux Document.

5.6 Practical recommendations for the GHF to enhance compliance with Montreux principles

1. Adopt an internal policy manual to regulate the contracting of security entities, including rules for selecting and training personnel.
2. Develop a code of conduct for contracted security entities, including respect for human rights and IHL.
3. Establish an independent internal committee to monitor security performance and receive complaints.
4. Organize training courses for security personnel on human rights and professional conduct in conflict.
5. Document all security contracts and assignments transparently and incorporate accountability clauses.

6. Key international criticisms of the GHF

6.1 Serving political interests and lack of independence

The GHF-based system has been proposed as an alternative to coordinated work through the UN and professional relief organizations. It has been favored by Israel and the United States over local and international expertise. The GHF is a new private mechanism supported by Israel and the United States. Created to assume responsibility for aid delivery in Gaza, it operates under the supervision of the Israeli government and lacks transparency, independence, and accountability.¹⁷

On April 17, the Palestinian NGO Network released a statement and a stark warning concerning the GHF, stating that it is dominated by Israeli control over access and logistics. This is in contrariety with the principles of neutrality, independence, and humanity.¹⁸

6.2 A centralized and geographically limited distribution system

Far from thousands of residents in the north, aid has been confined to four distribution sites in southern Gaza, creating discriminatory access based on location, not actual need. The GHF has emerged as one of the most controversial humanitarian initiatives in recent memory, provoking intense debate over the militarization of aid distribution and the core principles that govern humanitarian assistance. Launched in May 2025 with support from the United States and Israel, the Humanitarian Aid Fund represents an unprecedented attempt to circumvent traditional UN-led aid distribution mechanisms in Gaza through a model that employs private armed contractors and centralized distribution hubs.

The initiative has faced immediate operational failures, widespread international condemnation, and legal challenges. At the same, global calls have been made for an arms embargo on Israel. The model has forced civilians to travel long distances through combat zones to reach fortified fields, heightening risks to their safety.¹⁹

6.3 Distribution sites resembling military fortresses and endangering civilians

Distribution centers are secured by armed contractors and Israeli military guards, turning them into a hub of violence, rather than a humanitarian sanctuary. These have sparked significant controversy over the number of deaths and injuries among aid recipients. According to OCHA and MSF statistics and data from Gaza hospitals, more than 500 people have been killed and tens of thousands wounded while attempting to access food in close proximity to these sites.

¹⁷ fcnl.org.

¹⁸ PNGO Portal

¹⁹ Foreign Affairs ForumEL.

The method of supply distribution forces thousands of Palestinians, who suffer from hunger due to the Israeli blockade that has been in place for over 100 days, to walk long distances in order to reach the four distribution sites and struggle for what little food supplies remain. These sites are particularly inaccessible for women, children, the elderly, and persons with disabilities. People are often killed or injured in this chaotic process. Over 500 people have been killed and nearly 4,000 injured while trying to access food. The militarization of aid in Gaza is both inhuman and ineffective.²⁰

According to the latest MoH update of August 2, 2025, in addition to 11,230 people wounded, hospitals received a total 1,568 martyrs who were killed while searching for food. Reflecting only those who arrived at hospitals as a result of attempts to access aid, these figures do not represent the actual total number of fatalities since there may be missing persons who could not be reached.²¹

6.4 Insufficient quantity and poor quality of food supplies

Even if the announced figures were correct, distributed food is sufficient for only one day. Oftentimes, this food cannot be cooked due to the lack of fuel and water under the blockade. As a result of extreme poverty, food insecurity, and scarcity of basic supplies, most citizens head to distribution sites in overwhelming numbers, causing severe overcrowding. The number of food boxes is far less than the number of people present at these sites.²²

As put by Oxfam, the nutritional value is below the minimum acceptable physical standard and does not respond to the state of severe hunger. Oxfam notes that replacing 400 distribution points with only four is a major catastrophe that worsens the already dire humanitarian situation and exacerbates the pace of starvation.²³

6.5 Lack of transparency and accountability

According to a statement of the PNGO Network, the GHF model lacks any genuine humanitarian dimension. Rather, it reproduces Israel's practices under the label of "aid." It is a politicized and militarized model that excludes the most vulnerable groups. Perceived as a non-neutral distribution system that uses hunger to serve strategic political objectives, it is a tool for perpetuating civilian repression, let alone saving lives.²⁴

The GHF model unveils a systematic structure aimed at politicizing and transforming relief from a means of protection into a tool of pressure and subjugation. The international report indicates

20 doctorswithoutborders.org.

21 https://t.me/s/MOHMediaGaza?before=6830&utm_source=chatgpt.com.

22 EL PAÍS English.

23 oxfam.org.

24 PNGO Portal.

that the GHF does not operate under the four humanitarian principles (humanity, neutrality, impartiality, and independence). Instead, it is based on barter: food in exchange for displacement. It operates within a purely militarized environment under the supervision of the occupying Power.

This model is accused of creating a coercive environment that forces civilians to move to the south under conditions of siege and starvation. These become military targets at aid distribution sites, turning relief into a death trap. Accordingly, the GHF is not only a humanitarian failure, but also a partner in the policies of genocide and ethnic cleansing. According to human rights organizations, it also jeopardizes legitimacy of the global humanitarian system at large.²⁵

7. Positions of major humanitarian organizations

- CARE International officially rejected any cooperation with the GHF and affirmed that the ready and efficient UN mechanism must immediately resume implementation as an alternative to the new militarized system.²⁶
- Together with over 240 international organizations, Oxfam issued a joint statement titled “GAZA: Starvation or gunfire — not a humanitarian response”, calling for an end to the unsafe distribution system and return to the large-scale and UN-approved distribution network.²⁷
- MSF described the operation as a “carnage disguised as aid,” in light of the sharp increase in injuries due to indiscriminate gunfire near distribution sites.²⁸
- On July 27 and June 12, 2025, Tom Fletcher, Under-Secretary-General for Humanitarian Affairs and Emergency Relief Coordinator, described the GHF aid distribution centers as “deadly sites.” According to an official statement, 245 fatalities and over 2,150 injuries were reported at one distribution site within just two weeks.²⁹
- In a statement released on May 4, 2025, OCHA confirmed that the Humanitarian Country Team of the oPt “will not participate in any scheme that does not adhere to the global humanitarian principles of humanity, impartiality, independence and neutrality.” OCHA further emphasized that the GHF model violated these principles and forced civilians into overcrowded and high-risk military zones.³⁰

25 aa.com.tr+1.

26 care.org.

27 oxfam.org.

28 doctorswithoutborders.org.

29 Palestinian Territory+15UN Regional Info Center+15.

30 OCHA Occupied Palestinian Territory.

8. Recommendations

8.1 On humanitarian and operational levels

1. **Redistribute aid on a needs basis, rather than by geographic criteria**, through UN frameworks, structures, and partners. A distribution map should be developed based on an actual humanitarian needs assessment, including in northern Gaza and conflict zones, to avoid dangerous overcrowding in geographic areas. Distribution points should be expanded and increased to 400 as was previously the case. In collaboration with local partners and community-based organizations, these sites will be widespread and decentralized.
2. **Immediately detach humanitarian operations from any military or security presence**. Humanitarian safe zones will be established under the supervision of neutral parties, without the oversight of any armed forces or private security contractors. To be monitored by UN agencies, civilian humanitarian protection teams will be formed and tasked solely with protecting civilians during aid distribution.
3. **Reinstate local humanitarian expertise by reintegrating Palestinian local organizations** into relief operation management. These are the most capable actors for access and response. Effective coordination mechanisms must also be in place with international organizations.
4. **Implement the minimum humanitarian standards** to ensure the quality and safety of the food aid provided, ensuring suitability for the population's needs, especially amid food insecurity and progression into advanced stages of famine across the Gaza Strip.

8.2 At legal and human rights levels

1. **Demand the establishment of an international fact-finding commission** under the UN Human Rights Council to investigate violations committed by the GHF, including deaths around distribution centers, and to verify the responsibility of contracted security agencies.
2. **Reinvigorate the role of the Special Rapporteurs on the right to food and on the situation of human rights in the oPt**. UN rapporteurs will be called to visit the Gaza Strip and document cases of “starvation as a weapon of war” in accordance with Article 54 of Additional Protocol I to the Geneva Conventions.
3. **Initiate legal proceedings before national or international courts against implicated parties** and submit legal complaints based on the principle of universal jurisdiction. The 1949 Geneva Conventions, particularly Geneva Convention IV, oblige States Parties to search for and prosecute or extradite individuals accused of grave breaches of the laws of war, regardless of the perpetrator's nationality or location of the crime. This principle should be applied against private security companies, financiers of illegal activities, and direct perpetrators of killings. The GHF practices should be classified as “grave violations

of IHL,” including undisclosed forced displacement, use of starvation as a weapon, and exposing civilians to combat zones.

8.3 At political and institutional levels

1. **Launch an international diplomatic campaign to reject recognition of the GHF as a legitimate aid provider in Gaza.** Action will be taken within the UN Human Rights Council, European Union, and Organization of Islamic Cooperation to adopt a collective international position, denying recognition of, demanding the cessation of support for, the GHF as a legitimate humanitarian provider.
2. **Promote a review of US and European funding to institutions implicated in the militarization of relief.** Tools of civil and media pressure will be employed to cut off funding sources that contribute to militarizing humanitarian aid. To this effect, comprehensive reviews will be demanded within the US Congress and European Parliament.
3. **Submit a consolidated position paper by local and international organizations,** calling for the reinstatement of UN oversight over aid distribution, rejecting any model that violates fundamental humanitarian principles, and demanding full transparency in operational mechanisms.
4. **Support efforts to integrate the Montreux Document into national and international legislation.** Advocacy will be launched to transform principles of the Montreux Document from a “non-binding law” into binding legal standards, particularly in occupied or conflict-affected areas.

Finally, rebuilding the humanitarian system in Gaza requires dismantling the model of “institutionalized aid by force.” Aid must be transformed from a tool of control into a genuine protection mechanism rooted in dignity and rights. Ending the GHF is essential, alongside reinstating UN institutions such as UNRWA and the World Food Program.

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