



Photo: Al-Haq offices in Ramallah, November 2021. Credit: Mohamad Torokman / REUTERS

# European Funding for Palestinian NGOs as Political Subcontracting

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For two decades, the European Union and individual states of Western Europe have been major funders of Palestinian NGOs, under banners of economic development, peace, and human rights. European governments together provide approximately €35 million annually to a small and largely unchanging group of selected organizations. The recipients are substantial political and economic actors, and are among the leaders of intense soft power conflict, voicing repeated allegations of fundamental Israeli wrong-doing and encouraging anti-Israel campaigns through boycotts and lawfare. This paper argues that in contrast to the formal justifications of support for independent civil society organizations, the relationship is best explained through a unique subcontracting model. The EU and West European governments provide funding and access (particularly to media and international institutions such as the UN and ICC), in return for political services from the carefully selected Palestinian NGOs. This is evidenced by a detailed examination of repeated and overlapping grants and contracts from numerous European funding frameworks to the same group of recipients, including some linked to the PFLP terror organization.

*Keywords:* Europe, European Union, Palestinians, civil society, NGOs, PFLP, terror

## Introduction

The European Union and the individual states of Western Europe, from Finland and Sweden in the north to Italy and Spain in the south, have been and continue to be major funders of Palestinian non-governmental organizations (NGOs), under banners heralding economic development, peace, and human rights. European governments together provide approximately €35 million to these NGOs—also known as civil society organizations (CSOs)—year after year.

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This funding has weighty strategic implications, particularly for Israel, as well as for Palestinians and Europe. The recipient organizations are significant political and economic actors in the Palestinian context, and serve as important intermediaries for European government officials. From an Israeli perspective, they are among the leaders of intense soft power conflict, voicing repeated allegations of fundamental Israeli wrongdoing and encouraging anti-Israel campaigns waged through boycotts and lawfare. The decision of the International Criminal Court (ICC) prosecutor to open “war crimes” investigations and the publication of a blacklist of mostly Israeli firms by the UN Human Rights Council are products of this activity.

Although European officials justify these funding policies as based on general support for civil society worldwide, an analysis of the evidence raises many questions regarding the close relationships with Palestinian NGOs, which differ significantly from other cases. These questions relate to European objectives

(declared and apparent), the applicability of the “civil society” classification in the Palestinian case, and the interlocking relationships between the primary grantees and powerful political frameworks, including direct links among some of the more prominent NGOs to terror organizations.

In general, cooperation with and funding for NGOs is an important aspect of EU and Western European foreign policy, which emphasizes normative dimensions. In most cases, the processes by which governments provide NGO grants are based on periodic calls for proposals (CfPs) and detailed contracts in which the terms, objectives, and usually the recipient organizations change. In contrast, much of the funding for Palestinian NGO partners is done behind closed doors and without CfPs, and even when the CfP process is followed by EU funding mechanisms, there is very little variation in the choice of recipients or their activities. To the degree that the outcomes are evaluated after each grant cycle, this process usually relies on NGO self-reporting, and does not lead to changes. Very few, if any, of Europe’s Palestinian grantees have been disqualified for lack of performance or other reasons, while the obstacles to entry for other potential applicants are formidable (Birzeit University, 2016).

In the European context, the exceptional process-related dimensions of funding for Palestinian NGOs also raise significant issues. A detailed examination reveals that EU and European budgetary support for Palestinian NGOs is channeled through at least 60 separate frameworks, in which the majority of the grants are provided to a network of approximately 20 favored organizations.<sup>1</sup> In most other cases of European NGO support worldwide, funding takes place through a small number of frameworks. In these, as in other aspects, the Palestinian case is unique.

In examining exceptionalities over the past 20 years, a strong pattern surfaces whereby Palestinian NGOs emerge as steady but unacknowledged subcontractors and influence-

multipliers on behalf of the EU and the individual donor governments. As demonstrated by data collected and published by NGO Monitor (a non-governmental Jerusalem based-research institute founded and headed by the author of this article), the NGOs that were funded ten, and in some cases, twenty years ago, continued, as of the end of 2020, to receive grants from the same European mechanisms, despite changing formal requirements and lack of significant impacts in advancing the officially stated objectives.

Another exceptional dimension is the degree to which many of Europe's Palestinian NGO grantees were created by or are linked to the Popular Front for the Liberation of Palestine (PFLP). The PFLP is both a political framework and member of the PLO, and is designated as a terror organization by the EU, as well as the US, Canada, and Australia. For many years, these relationships were hidden, and their recent emergence has led to increased questioning.

### **“Civil Society” and European Foreign Policy**

Analysts of modern economics and politics often divide the social order into three core sectors: government, business, and a third sector, based on civil society organizations, also known as non-governmental organizations. In theory, the structures, policies, funding, and activities of these organizations are independent of state mechanisms and political frameworks, and are therefore capable of providing independent and critical perspectives on government policies and practices (Frane, 2008; Keck & Sikkink, 1998).

In practice, however, the separation and independence is often illusory, particularly with respect to external NGOs. Western government officials develop close alliances with these groups, providing funding and blurring the fundamental distinction and boundaries between the sectors (McMahon, 2017; Steinberg & Wertman, 2018). Selected NGO partners are important sources of information and influence, particularly regarding foreign

policy issues when the operational capabilities and resources of government offices are weak. The exchange aspect, in the form of payments provided by government frameworks to the organizations in return for services, assumes central importance. In 2001, US Secretary of State Powell acknowledged this, referring to the NGOs in conflict zones that are supported by the United States as important “force multipliers” (Rieff, 2010). In contrast, European officials do not acknowledge this core factor in their close relationships with specific NGOs, even though the extent of this support, as well as the centrality of this cooperation, is far more extensive in comparison to United States activity. Instead, European policymakers, political leaders, and analysts discuss NGO partnerships in general and normative or altruistic terms as “support for civil society” and promotion of international norms (European Institute of the Mediterranean, 2020).

When NGOs depend on governmental support and work closely with their patrons, their status is inherently blurred, and they become GONGOs—government-funded NGOs (Bendell & Cox, 2006). Analyzing such relationships, Sternberg (2010) noted that “such NGOs belie the term ‘non-governmental’; many are not part of civil society.” The growth of foreign government funding led analysts to coin the terms FONGO or FFUNGO (foreign funded NGOs) (Dupuy et al., 2015). In these cases, the presumed independence of the recipients is clearly compromised. One prominent example is Russia's widespread use of NGOs to promote its interests on a number of issues, including vis-à-vis the European Union (AALEP, 2016).

The problematic nature of European dependence on foreign NGOs is discussed to some degree by McMahon (2017) in her examination of the European Union's extensive support for NGOs in the Balkan conflicts in the 1990s. During this period the EU and other European government frameworks funneled millions into organizations, based on the belief in their “transformative power”

and expectations that they would play a major role in ending violence, providing humanitarian aid, and advancing democratic norms. A dedicated industry arose to prepare proposals and develop personal contacts in order to access the large sums, with little or no oversight. McMahon showed that the processes were fundamentally flawed, with numerous dysfunctions, including funding for NGOs that had disappeared.

### Europe's Palestinian NGO Subcontractors

The European relationships with favored Palestinian NGOs are significantly more extensive than in the case of the Balkans, involving long periods (often 20 years or more) of repeat grants, close cooperation, and much higher budgets. The centrality of these NGOs in European policy is expressed in numerous official reports. For example, a publication titled "Evaluation of the European Union's Cooperation with the occupied Palestinian territory and support to the Palestinian people: 2008-2013" includes over 200 references to civil society, and cites numerous meetings with NGO officials (European Commission, 2014).

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References to "independent" Palestinian civil society and the justifications for the extraordinary relationships with these organizations are highly problematic. The areas under Palestinian control lack the basic criteria necessary for civil society to function—specifically, free speech, unimpaired criticism, transparency, and accountability. The PLO and the Palestinian Authority keep tight control over political activities and organizations, and only those with the necessary connections are

able to function and to receive foreign money (Muslih, 1993; Shafi, 2004; Feith, 2021). Most of the main Palestinian NGOs repeatedly funded by European governments are controlled by or closely tied to powerful political factions—for example, Miftah is headed by Hanan Ashrawi, a former PLO minister and member of the Fatah leadership, and others are linked to the Popular Front for the Liberation of Palestine (PFLP). A top leader of ARIJ (the Applied Research Institute Jerusalem) has also served as a minister in the Palestinian Authority. Thus, they are far from independent actors, and use of the term "civil society" or NGO in this context, and the European claim that funding policies derive from normative factors, is artificial.

Instead, the close European ties to approximately 20 favored NGOs are more accurately described in terms of an extensive subcontractor framework, reflecting three essential elements:

- a. Cooperation toward shared concrete project and policy objectives (in contrast to claims of disinterested and altruistic support for civil society)
- b. A hierarchical structure and division of labor in which the stronger actors (European governments) take the lead and provide the funds, and the others (Palestinian NGOs) provide important services
- c. Regular, contractually-based payments from the primary policymakers to the subcontractors.

Although European decision making processes on NGO funding are tightly-held secrets, the substantive, as distinct from declaratory, objectives can be inferred from government documents, project descriptions, and interests. For EU and Western European officials, involvement in the Israeli-Palestinian arena and negotiation efforts is a central priority. The EU has a coordinator for the Middle East peace process, participates in the Quartet, and competes with the US for visibility and influence. The extensive NGO subcontractor relationship assists in these and other objectives.

The selection of specific NGOs is also consistent with European political priorities, which emphasize the importance of playing a major part in the conflict and in peacemaking efforts. In the 1980s, in response to the central role of the US in the Egyptian-Israeli peace process, the EEC adopted the 1980 Venice Declaration, which called for a PLO-controlled Palestinian state, based on the pre-1967 lines, with its capital in East Jerusalem, and leading to peace (Pardo & Peters, 2009; Hollis, 2013; Tovias, 2021). Numerous EU documents declare the objective of “a two-state solution with an independent, democratic, viable and contiguous Palestinian state” (European Union, 2021). To promote this vision, European officials and analysts emphasize symmetry or power balance, apply pressure on Israel, particularly by condemning settlement construction and other activities as violations of international law, joined by accusations of disproportionality in response to attacks from Gaza and similar claims. Europe’s main NGO partners have parallel agendas and reinforce this objective.

Furthermore, although Europe’s direct leverage in pressuring Israel is very limited, compared to the US, through close cooperation with NGO partners, the EU and individual European states are able to increase their visibility and impact. For example, the process (2016-2020) whereby the UN Human Rights Council published a database of Israeli and other companies accused of illegally doing business in the OPT (“occupied Palestinian territories”) involved major roles for the NGOs supported by Europe. The same organizations were largely behind the EU’s adoption of product-labeling regulations for the territories. Similarly, Germany and others have officially opposed the decision by the prosecutor of the ICC to open “war crimes” investigations of Israelis, but are among the main funders of the Palestinian NGOs most active internationally in supporting this effort (NGO Monitor, 2019). On these issues, the EU and the governments have generally kept an official low profile, while the NGOs take the lead.

In these soft power processes, the NGOs act as important European foreign policy subcontractors. The grantees—including those involved in agriculture, health, human rights, and education—are very active in lobbying for agendas consistent with the dominant Palestinian political narrative. While the key role of the European patrons is hidden, case studies document the significance of NGO influence on Israeli-Palestinian issues through media campaigns, lobbying efforts with members of parliament, and international institutions (Bicchi, 2013; Voltolini, 2015; Steinberg, 2016). If European officials provide direct support for boycotts of Israeli cultural institutions, universities, or sports teams, or for lobbying the ICC to open war crimes investigations of Israelis, this would be considered blatant interference and a violation of the general rules of sovereignty. Instead, they quietly fund influential Palestinian political advocacy NGOs in order to promote these policies, and when confronted occasionally by Israeli officials, claim that the civil society organizations funded by Europe set their own agenda and act independently (European Parliament, 2015; Winer & Ahren, 2018).

The EU’s diplomatic delegation in Ramallah (EUREP) highlights frequent NGO consultations, including in “EU/PA sub-committees, which take place every year in six different domains.” The organizations are involved with “all main EU programming exercises,” including “Call for Proposals priorities”—meaning that grant recipients also make decisions on the allocations of funds (European Commission, 2014). EU documents, reports, and “action plans in favour of Palestine” specify numerous objectives to be carried out in cooperation with Palestinian NGOs that promote joint European/Palestinian policies in Area C, lawfare initiatives couched in terms of “supporting human rights defenders and human rights organisations and their advocacy at different levels,” and similar efforts (European Commission, 2018). The contracts between individual countries

and their NGO grantees specify joint objectives such as providing support to Palestinian “detainees and prisoners.” Shortly after the US recognized Jerusalem as Israel’s capital in 2017 and then relocated the embassy, EU grants to NGOs began to specify projects on the “urgent need to preserve the Palestinian identity of EJ (East Jerusalem)” and to “protect Islamic and Christian Waqf religious and cultural heritage properties against Israeli violations and threats” (NGO Monitor, 2020e).

The third element in the subcontracting structure is based on regular European funding of approximately 20 favored Palestinian NGOs, compared to the 135 members of the PNGO umbrella organization, and more than 1000 organizations registered with the Palestinian National Authority’s Interior Ministry (2021). As data published by NGO Monitor demonstrate, the core group is supported through multiple European state sources (horizontal clustering). Furthermore, this pattern is repeated across funding cycles, and the recipients are dependent on these state donors for salaries and basic operational costs extending over many years (vertical clustering). The relevant decision making and evaluation processes are tightly-kept secrets, preventing substantive and independent oversight.

The clustering resulting from NGO subcontracting is facilitated by the fact that these organizations possess the wherewithal to navigate the complex application process. Preparing applications requires the services of lawyers and accountants, as well as the submission of numerous official forms, which, in the context of the West Bank and Gaza, require major investment of professional resources (EuropeAid, 2014). The working relationships between the NGO leaders and their European patrons reinforce these advantages, and the top officials among the grantees are portrayed by Palestinian analysts as forming a privileged elite (in large part due to their disproportionately high salaries) (Jamal, 2007).

The limited available information also indicates a high level of dependency by this group of Palestinian NGOs and their funders. In the case of Hanan Ashrawi’s Miftah organization, as of 2018, European government frameworks provided approximately 90 percent of the total annual budget, of which approximately one-third is from the EU (Miftah, 2019). Al Mezan received about half of its income from European governments—of which the largest source is also the EU, accounting for about 20 percent.<sup>2</sup> This too is consistent with a subcontractor relationship.

### **Evolution of European Funding Frameworks for Palestinian NGOs**

Evidence of the close relationships between leaders of Palestinian NGOs and their European patrons begins in the 1980s, with the development of support groups among church leaders and activists, including academics, in a number of countries. In the Netherlands, the influential leaders of Pax Christi, Novib (later Oxfam Novib), and the Palestine Committee (often with overlapping memberships) organized events and arranged for delegations to travel and meet with academics and others associated with Fatah and the PFLP. These events, presented as promoting peace and economic development, were funded by branches of the Dutch government, and nurtured close personal relationships with political figures and government officials.

Encouraged by the Europeans, the Palestinians formed NGOs in order to facilitate the funding process and to enhance the political impact. A number of their European allies were elected to political positions and appointed as government officials, where they directly influenced funding (Siebelt, 2017). Similar strategies were documented for Switzerland, Germany, Sweden, and other countries (Rickenbacher, 2017). This process gradually evolved into the deeply ingrained support for the Palestinian NGOs involving tens of millions

of euros annually, and in which the grantees became subcontractors for state officials and policymakers.

Influenced by Netherlands officials, large scale and systematic EU funding for Palestinian organizations began in the late 1990s. The 1995 Euro-Mediterranean (Euro-Med) Conference created a framework for supporting “like minded” NGOs to further “rapprochement between peoples” through “exchanges between civil society” (Union for the Mediterranean, 2020). The Partnership for Peace (PfP) mechanism provided between €5 and €10 million annually. (In 2016, the PfP became a project of the European Neighbourhood Instrument (ENI) and was renamed as the EU Peacebuilding Initiative.) Formally, grants to NGOs required cooperation with Israeli organizations, but very few of the projects involved actual cooperation, as the Palestinian NGOs oppose normalization with Israelis, and the EU largely accepted this stipulation (Quer, 2020). An internal EU document acknowledged that the PfP effort was hampered by “non-normalization movements and lack of acceptance of Cooperation with Israel” (European Commission, 2014). However, in this as in many other instances involving support for and close cooperation with Palestinian NGOs, funding continued without interruption, suggesting that the official objectives are not central to these relationships.

In addition to the PfP, which is specific to the Israeli-Palestinian issue, the EU operates six generalized NGO funding mechanisms, including the European Instrument for Democracy and Human Rights (EIDHR) and the European Civil Protection and Humanitarian Aid Operations (ECHO) (Table 1). These seven frameworks provide repeated and often overlapping funding to a largely unchanging group of Palestinian NGOs.

In parallel, the individual West European countries established separate NGO funding mechanisms active in supporting Palestinian organizations (Table 2). There are approximately 60 such frameworks in the EU and 13 countries,

including Norway and Switzerland (although outside the EU, they follow very similar policies). They are managed by the national Foreign Ministries and by aid agencies, such as SIDA (Sweden), NORAD (Norway), Irish Aid, the German Ministry for Economic Cooperation and Development (BMZ), and ECHO in the EU. In addition, church-based organizations in these countries receive large budgets from the state in order to provide aid (Pax Christi and ICCO, Netherlands; Christian Aid, UK; DanChurchAid, Denmark, and so on), and considerable amounts are provided to the Palestinian NGOs.

**Table 1. EU Funding Frameworks for Palestinian NGOs**

1	Partnership for Peace (PfP)
2	European Instrument for Democracy and Human Rights (EIDHR)
3	Instrument contributing to Stability and Peace (IcSP)
4	European Neighbourhood Instrument (ENI)
5	Development Cooperation Instrument (DCI)
6	Department for Humanitarian Aid and Civil Protection (ECHO)
7	European Endowment for Democracy (EED)

Furthermore, in Germany, political foundations associated with the different parties that receive federal budgets also support these NGOs. Specialized frameworks in the Netherlands, UK, and Belgium, such as Oxfam Novib, Oxfam GB, and Oxfam Solidarité, and Norwegian People Aid (NPA “the labour movement’s humanitarian organization for solidarity”) are additional mechanisms that often fund the same group of approximately 20 Palestinian NGOs. In examining the available data, there is no substantial evidence of a division of labor, or specializations among the different funding frameworks, even within the same country (other than the short-lived and failed pooled mechanisms involving four European nations, and managed by the Palestinian grantees themselves) (Steinberg, 2020). This plethora of state-based funding mechanisms for Palestinian

Table 2. European State Funding Mechanisms for Palestinian NGOs

Country	Main NGO Funding Frameworks	State-Funded Church and other Aid Groups	Pooled Funding Frameworks
Belgium	Foreign Affairs, Foreign Trade and Development Cooperation	Broederlijk Delen	
Denmark	Danida (Danish International Development Agency)	Dan Church Aid	HR/IHL Secretariat (ended 2017)
Finland	MFA	Finn Church Aid	
France	AFD (French Development Agency)	Comité catholique contre la faim et pour le développement (CCFD-Terre Solidaire) (5% of budget from state)	NDC
Germany*	BMZ (Ministry for Economic Cooperation and Development) GIZ (Corporation for International Cooperation) AA (Foreign Office) ZFD (Civil Peace Service) Political Foundations (Stiftungen)	Misereor (Catholic) Brot fuer die Welt—EED (Protestant)	
Ireland	Irish Aid	Trocaire Christian Aid Ireland	
Italy	Ministry of Foreign Affairs and International Cooperation	Associazione Comunità Papa Giovanni XXIII	
Netherlands	MFA	ICCO, OXFAMNovib	HR/IHL Secretariat (ended 2017), NDC
Norway	NORAD Norwegian Refugee Council Norwegian People's Aid	Norwegian Church Aid	
Spain	AECID; regional NGO funding agencies		
Sweden	SIDA	Church of Sweden Diakonia	HR/IHL Secretariat (ended 2017), NDC
Switzerland	EDA (MFA); Swiss Agency for Development Cooperation (SDC)	HEKS	HR/IHL Secretariat (ended 2017)
UK	Department for International Development (DFID); Foreign and Commonwealth Office (FCO)	Christian Aid CAFOD OXFAM-GB	

\* On Germany, see [NGO Monitor](#)



(and in some cases, also Israeli) NGOs, and the concentration of contracts and grants among a small number of recipient organizations, has no parallel, including in other conflict areas, such as the Balkans.

## 20 Years of NGO Subcontracting: Empirical Analysis

The primary European NGO frameworks, including those with the largest budgets involving the most influential organizations, do not publish and appear not to possess systematic and comprehensive information on funding for Palestinian NGOs.<sup>3</sup> Amounts, time frames, and project titles for individual grants are often posted in different forms (except for those that remain hidden), but NGO funding databases, such as the periodic reports from the PfP and EIDHR mechanisms, or the European Commission's recent online FTS (Financial Transparency System) do not aggregate the totals. In addition, most Palestinian NGOs that receive European funds do not publish annual financial reports with this information.

Therefore, in order to discern broader funding patterns across the different organizations and over multiple years and analyze their combined political impacts, NGO Monitor collected and cross-referenced this information from all the relevant actors and sources. The data, organized in the tables presented below, highlights the intensity and the subcontracting dimensions of these relationships between European governments and a small group of Palestinian NGOs, and provides the empirical foundation for this analysis.

Overall, among the various mechanisms, the EU's seven frameworks have provided the largest aggregate funding, with grants of between one and three years, in amounts of up to several million euros. Table 3 presents the available information on the 12 Palestinian organizations that have received the greatest levels of support between 2008 and 2018.

Of particular importance is the prevalence of repeat recipients (vertical clustering), with

multiple and often overlapping contracts involving a small group of favored organizations. While such clustering and a few overlapping grants can be found among the hundreds of annual EU contracts with NGOs worldwide, the extent in the Palestinian case is far greater. For example, ARIJ, in partnership with the Land Research Center (LRC), received a grant from the EU in 1999, and continued to be a major recipient for most or all of the next twenty years, via three separate EU bodies (ENI, PfP, and EIDHR). The Union of Agricultural Work Committees (UAWC), Defence for Children Palestine (DCIP), Al-Dameer, and Miftah were funded by EIDHR in most of the years between 2008 and 2018. (The information is incomplete and it is likely that the EU funding for these NGOs was continuous.) The PNGO umbrella group that coordinates policies for 135 NGO members (as of January 2020) and negotiates with the EU on funding contracts, including attempts to add clauses that would prevent support for groups linked to organizations on European terror lists such as the PFLP (Jewish News Service, 2019), also receives EIDHR support.

For long-term subcontracting (including the political dimension suggested in this analysis), repeat grants to the same organization over many years is easier bureaucratically and more efficient than a rapid turnover, and fosters close cooperation between the European officials and the heads of the Palestinian NGOs. Both sides know what is expected of the other and function according to their experience and these expectations. If the European donors were simply providing altruistic assistance to Palestinian civil society, rather than a quid pro quo, these factors would be irrelevant.

All twelve of the core EU grantees listed in Table 3 are centrally involved in advocacy to strengthen the Palestinian position and weaken Israel (ostensibly in order to promote negotiations), as reflected in the project objectives, thus highlighting the policy dimension of the relationship. For example, in 2017, DCIP (which is linked to the PFLP,

Table 3. EU Funding for 12 Palestinian NGOs (2008-2018)

NGO Grantee	EU Mechanism	Years	Amount	
Al-Dameer*	EIDHR	2016-19	€446,482	
		2014-15	€100,707	
		2008-10	€355,882	
Al-Haq*	EIDHR	2017-20	€296,600	
Al Mezan*	EIDHR	2017-20	€449,997	
Applied Research Institute Jerusalem (ARIJ)	ENI	2019	\$1,485,673	
		2018	\$1175741	
		2017	\$1116195	
		2015	\$480658	
	EIDHR	2015	\$480658	
Defense for Children International—Palestine (DCIP)*	PfP	2009 - 11	\$374175	
		EIDHR	2019-20	€ 732,477
			2017	€ 961,298
Health Work Committees (HWC)*	ENI	2009-12	€ 600,000	
		2017	€ 699,236	
JLAC	ENI	2017	€699,236	
		2019	\$154,235	
		2017	\$386331	
Miftah	EIDHR	2016	\$639,654	
		2017-20	€300,000	
		2010	\$79,906	
Palestinian Center for Human Rights (PCHR)*	EIDHR	2008	\$100,531	
		**	2017	€164,000
Palestinian NGO Network (PNGO)*	EIDHR	2005	€293,225	
		2016-19	€446,485	
Union of Agricultural Work Committees (UAWC)*	EIDHR	2017-20	€261,914	
		ENI (€3.6 m) and 4 DCI contracts (€14.7 m)	2011-17	€18,300,100
UPWC*	ENI	2017-2019	€ 699,236	

\* Linked to PFLP

\*\* Indirect EU funding via grant to the Norwegian Refugee Council

**Source:** Based on EC documents and NGO reports as compiled and published by NGO Monitor

as detailed below) received a total of €1.7 million from two separate EU mechanisms. ENI allocated €699,236 for “Strengthening Community Resilience and Social Cohesion in East Jerusalem on Both Sides of the Separation Wall” (in partnership with a political NGO based in the Basque region that promotes the Palestinian narrative). At the same time frame, EIDHR signed a €981,298 contract with DCIP for

“Prevention, Mitigation and Rehabilitation for Palestinian Children Exposed to Torture and other Cruel, Inhuman or Degrading Treatment.” Although phrased in normative terminology, both contracts advance clear political objectives, promoted by the Palestinian NGO as a stand-in or substitute for the European officials.

The fact that in this, as in other cases, the Palestinian NGO received overlapping grants

Table 4. Vertical Clustering: 5 or More Confirmed Years of Funding (2005-2020)

	Addameer*	Al-Dameer*	Al-Haq*	Al Mezan*	ARIJ	BADIL	DCIP*	HWC*	Miftah	PCHR*	PNGO	UAWC*
EU	-	7	-		7	-	6	-	6	-	5	7
Belgium	-	-	-	-	-	-	5	-	-	-	-	-
Denmark	7	7	11	10	-	11	11	-	6	11	6	-
France	-	-		-	-	-	-	-	-	-	-	-
Germany	-	-	-	-	-	-	-	-	6	-	-	-
Ireland	6	-	-	-	-	-	-	-	5	-	-	-
Italy	-	-	-	-	-	-	6	-	-	-	-	-
Netherlands	7	7	7	7	-	7	11	-	6	7	6	9
Norway	-	-	5	-	-	-	-	-	6	5	-	-
Spain	6	-	-	-	-	-	-		-	-	-	-
Sweden	8	7	11	10	-	10	11	5	6	10	6	-
Switzerland	8	9	11	10	-	10	11	-	6	12	8	-

\* Linked to PFLP

**Source:** Based on country documents and NGO reports as compiled and published by NGO Monitor

(known as double dipping) highlights the importance of these groups for EU policymakers. In addition, the absence of published evaluations of these projects, and the prior funding for DCIP under numerous project titles, suggests that the expenditure and implementation details are facades of no importance. As the evaluations posted by NGO Monitor demonstrate, DCIP's activities are largely constant from year to year and project to project—the details are irrelevant (NGO Monitor, 2020a).

Similarly, in 2019, ARIJ received two large EU grants; one for a political advocacy project labeled “Towards better promotion and protection of human rights in Area C and Gaza Strip” (€649,998) and the other for “Assessing the impediments before the two-state solution” (€700,000). Descriptions of both projects are very general, with no tangible and measurable results. As reflected in these and other project descriptions, ARIJ is a highly politicized NGO consistently involved in numerous high-profile campaigns related to Israel and the Israeli-Palestinian conflict. These details are consistent with the thesis that the EU funding for

specific NGOs is a generalized form of political subcontracting.

The data also demonstrates that the EU's pattern of large-scale and repeat funding for and cooperation with a small number of Palestinian NGOs is characteristic of the policies of the individual West European countries. As reflected in Table 4, the countries have their favored NGO subcontractors—in some cases, one or two that receive multiple grants over many years, and in others, up to nine or ten, with considerable overlap between many of the recipients. As in the EU, there are also examples of overlapping contracts to the same NGO, such as Belgium government funding (through Viva Salud and Oxfam Solidarité) of the United Health Workers Committees (UHC).

In summary, the pattern of repeat grants from different frameworks to a small group of Palestinian NGOs reflects the dominant subcontractor relationships, in which the grantees work closely with their patrons to promote political objectives, in contrast to altruistic assistance to independent civil society organizations.

## The Terror Links of Core European NGO Partners

Evidence gradually surfaced indicating that many of the Palestinian NGO partners and grantees with the largest and most frequent European grants are linked to and headed by officials from the Popular Front for the Liberation of Palestine (PFLP), including some that are formal affiliates (USAID, 1993; NGO Monitor, 2020c; Israel PMO, 2019).

**Many of the Palestinian NGO partners and grantees with the largest and most frequent European grants are linked to and headed by officials from the Popular Front for the Liberation of Palestine (PFLP), a terror organization prohibited from operating or raising funds in the EU, the US, Israel, Canada, Australia, and elsewhere.**

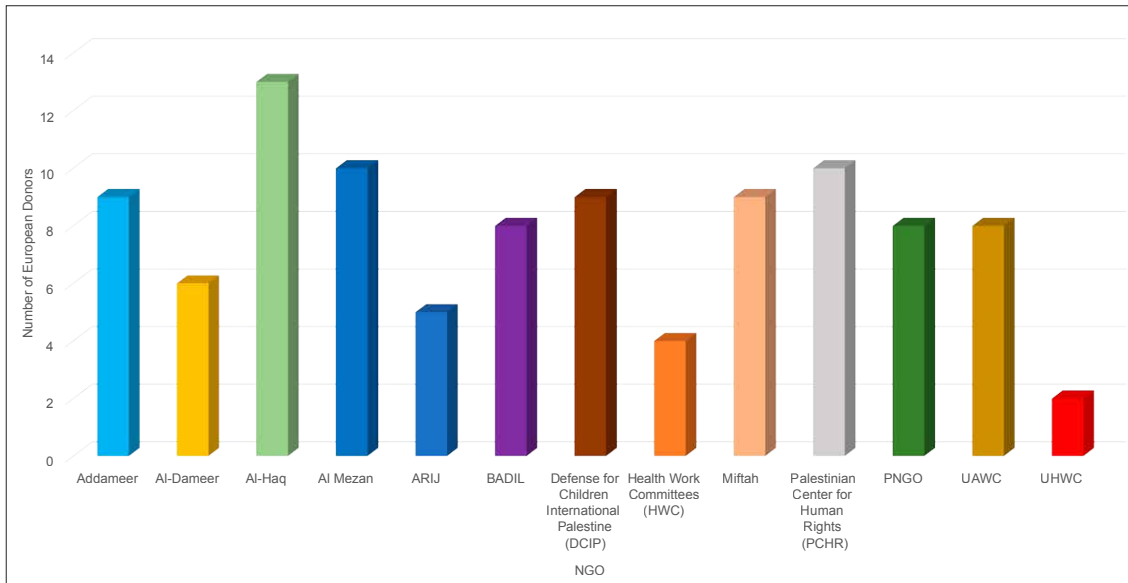
The PFLP is a constituent group in the PLO structure, and following a series of major attacks over many years, was listed as a terror organization prohibited from operating or raising funds in the EU, the US, Israel, Canada, Australia, and elsewhere. (Levitt, 2021) The associated network consists of two types of NGOs: one group highlights agendas in the realm of human rights (such as Al-Haq, Addameer, Al-Dameer, PCHR, Al Mezan, and DCIP), and another group takes the form of economic and social frameworks—Union of Agricultural Workers Committees (UAWC), Health Workers Committees (HWC), Union of Palestinian Women’s Committees (UPWC)—as well as the PNGO framework (NGO Monitor, 2020c).

Although these NGOs do not highlight this affiliation, the details are readily available from public sources. According to research published by NGO Monitor, as of September 2021, 74 officials from ten NGOs were identified as PFLP members, including a number that have been arrested, tried, and convicted in Israeli courts for involvement in terror-related activities (Harkov, 2021). The Palestinian Center for Human Rights (PCHR), based in

Gaza, is headed by Raji Sourani, a convicted PFLP member whose role is celebrated by the terror group, as seen in a February 2014 award ceremony attended by members of the PFLP central committee. These ties are also demonstrated in many other sources. In addition, the Deputy Head of the PCHR Board, Jaber Wishah, commanded the PFLP’s military force in Gaza, and in 1985 was sentenced to life imprisonment for involvement in terror attacks (he was released in 1999), according to Hebrew and Arabic-language media (NGO Monitor, 2020b).

In the Health Workers Committee (HWC), which is funded by the EU, Sweden, Belgium, and other European mechanisms, finance and administration manager Walid Hanatsheh is identified on social media posts as a PFLP leader (NGO Monitor, 2021b). He was arrested and is on trial for commanding the PFLP cell that detonated the bomb that killed Rina Shnerb in August 2019. Five additional HWC officials—general director Shatah Odeh; accountant Tayseer Abu Sharbak; Said Abdat, previously HWC accountant; Amro Hamouda, the former head of HWC purchasing; and Hoani Rishmawi, responsible for HWC fundraising in Europe—were arrested for “using fraud and deception in many European countries in order to receive large-scale financing worth millions of Euros” which was diverted to the PFLP. According to the Israel Security Agency, the diversion included “reporting fictitious projects, presenting false documents, forgery and inflating invoices and receipts...forging bank documents and bank seals,” and other methods (Israel Ministry of Foreign Affairs, 2021; Levitt, 2021).

Similarly, DCIP has included a number of PFLP members. Some have been tried and convicted for involvement in terror attacks. Hashem Abu Maria (killed in 2014 during a violent confrontation) was acknowledged by the PFLP as a leader and “true revolutionary comrade” who participated in “the national liberation struggle and the PFLP from an early age, arrested several times, and was a model



**Figure 1. Horizontal Clustering in European Funding for Palestinian NGOs**

for a steadfast struggler and advocate for the rights of our people through his work in Defence for Children International.” Other officials have participated in PFLP events, marked by the flags of the organization and indicating active involvement. Riyad Arar, Director of DCIP’s Child Protection Program and coordinator of cooperation with UNICEF on “monitoring human rights violations” addressed a 2014 PFLP event in memory of Abu Maria. Nassar Ibrahim, previously president of DCIP’s General Assembly and a board member, is the former editor of *al-Hadaf*, the PFLP’s publication, and a frequent participant in the organization’s events. A December 2015 video shows Ibrahim praising the “right of resistance” and declaring, “The balance of power to the ground will not be changed by negotiation...only by resistance” (NGO Monitor, 2020a).

Shawan Jabarin, who heads Al-Haq, was convicted in the 1980s for arranging PFLP training, and again in 1994 for continued involvement with the PFLP. He has been barred at times from leaving Israel, as affirmed by the Israeli Supreme Court. (Jabarin is also a member of Human Rights Watch’s Middle East Advisory Board, and Secretary General of the Paris-based International Federation of Human Rights.) The decision declared that he was “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” (High Court of Justice, 2007).

These PFLP/NGO officials have extensive connections with influential European government officials dealing with Middle East and human rights and international aid issues, including funding (Welchman, 2021). The PFLP is based in the Palestinian Christian community, and their European contacts began through Pax Christi and similar church frameworks (Rabbani, 1994). Based on these links, NGOs such as Al-Haq and DCIP began to receive funds from the Netherlands and other countries for conferences and related events (Siebelt, 2017). The structured subcontracting relationships and accompanying grants expanded to other countries and to the EU (horizontal clustering). In the period from 2005 to 2020, Al-Haq received funds from at least 13 governments; PCHR and Al Mezan from ten, and for DCIP, nine mechanisms are known (Figure 1).

In most cases, as shown in Table 4, the contracts are also repetitive (vertical clustering). For example, Norway has supported Al-Haq in most of the years since 2007, and the Dutch Foreign Ministry has funded DCIP since 2008.

As demonstrated in Figure 1 and Table 4, the relationships with these NGOs are also characterized by repeat grants over many funding cycles (vertical clustering). The amounts received by the PFLP network of NGOs from their European patrons reflect the importance of these connections. Between 2011 and 2019, the EU alone provided at least €38 million to the PFLP NGO network, and the overall European funding is estimated at €200 million (NGO Monitor, 2020d; 2021a).

In addition to salary payments, European support enables the organizations to hold events, organize press briefings, and publish numerous reports targeting Israel. Leaders of Al-

Haq, PCHR, Addameer, Al-Dameer and Al Mezan visited The Hague to meet with ICC officials and held widely publicized events promoting allegations of Israeli war crimes and human rights violations (NGO Monitor, 2019). Funding specifically for this purpose comes from the EU, Germany, Ireland, Switzerland, Norway, and the Netherlands (Table 5). For example, Addameer and Al-Dameer received grants from the Swiss government in 2018 for preparing “follow up for the submission to the ICC” (Swiss Confederation, 2018). The NGOs have a similar agenda in the UN Human Rights Council, including submission of reports and sponsorship of side events during Council meetings.

**Table 5. European Funding for NGOs Promoting ICC Investigations, 2016-2020**

Donor	NGO	Amount	Year(s)	Brief Project Description
EU	Al-Dameer	€450,000	2016-19	Contributing to the respect, protection, and promotion of the right to association in the Gaza
	Al-Haq	€300,000	2017-20	Righting the Wrong: “empowering Palestinian civil society to promote effective reporting and implementation on international rights instruments Palestine acceded to in 2014”
	Al Mezan	€450,000	2017-20	“Strengthening monitoring, protection and rehabilitation of civilians victimized by, or at risk of, human rights and IHL violations in Gaza with relation to access restricted area and torture”
Germany	PCHR	€340,000	2017	General support
Ireland	PCHR	€80,000	2017	General support
Italy	Al-Haq	€1,190,000	2018-20	Land and Rights—Paths of social and solidarity economy in Palestine
Netherlands	Al Mezan	€200,000	2018	Bilateral support
Norway	Al-Haq	NOK 2,000,000	2018	Supporting monitoring and documentation of human rights violations
Switzerland	Addameer	CHF 120,000	2018	Protection of the rights of Palestinian political prisoners in Israel
	Al-Dameer	CHF 77,221	2017-19	Promoting the right to freedom of association and the prohibition of torture in Gaza
	PCHR	CHF 280,000	2018	Gaza Strip: protecting human rights, promoting the rule of law and respecting democratic principles

The evidence linking European NGO grantees and the PFLP was raised in a 2018 publication of the Israeli Ministry of Strategic Affairs, accompanied by a letter to EU Vice President Mogherini. In her response, Mogherini rejected the claims, labeling the report as “disinformation,” but did not cite any details (Winer & Ahren, 2018). Following the 2019 arrest of NGO officials, including from UAWC and HWC, European journalists and members of parliament in the Netherlands, Belgium, and the EU raised the issues. However, European officials continued to reject the Israeli evidence as sufficient to tie the NGOs definitely to terror attacks (Harkov, 2020). This blanket rejection was repeated in May 2021, after the Israeli Ministry of Defense published a detailed charge sheet and gave detailed briefings on the diversion of funding by employees of the Health Workers Committees. Shortly afterwards, a Belgium minister declared, giving no details, that an investigation had been conducted and “no concrete evidence” was uncovered (Bové, 2021).

An exception to the European non-engagement strategy on support for terror-linked NGOs occurred in May 2020, when EU Commissioner for Neighborhood and Enlargement Olivér Várhelyi (from Hungary) ordered an internal review of potential terror ties among Palestinian NGO grantees (as of September 2021, this review had not been completed) (Varheyli, 2020). And in 2021, the Budget Committee of the European Parliament directed 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; and to ensure that these Union funds are proactively recovered, and recipients involved are excluded from future Union funding” (European Parliament, 2021). Furthermore, the EU’s anti-fraud watchdog (OLAF) is reported to have opened an investigation (Kaag, 2021).

As European officials had noted, although individuals were arrested for their roles in the PFLP, the activities of these NGOs were not restricted in Israel, notwithstanding the allegations of terror links. This changed on October 22, 2021, when the Ministry of Defense formally designated six organizations, Al-Haq, DCIP, UAWC, UPWC, Bisan, and Addameer, as linked to the PFLP terror framework (Israel Ministry of Defense, 2021). According to the declaration, the organizations “received large sums of money from European countries and international organizations, using a variety of forgery and deceit ways.” (HWC had been previously designated as such in 2015.) This decision was apparently motivated by the 2019 attack on Rina Shnerb and other recent PFLP terror attacks, and the central roles of the NGO officials, as well as alleged diversion of funding from the NGOs.

The Israeli government did not publish details or name the individuals involved, as highlighted by officials of the European government as well as the NGO and allies, but as noted, these details are widely available. As before, the immediate response of European officials was to defend their policies and assert that the Israeli government had failed to provide additional evidence of these links. Speaking in Jerusalem, Irish Foreign Minister Coveney declared, “I don’t believe the international community has been given the evidence to show that these six NGOs are contributing to terrorism” (Weiss, 2021). Coveney also repeated the European claim, not backed by evidence, that “we know where Irish money is spent, and ensur[e] that it is not spent inappropriately and certainly in the context of terrorism.” The impact of these developments on funding for Palestinian NGOs and the wider subcontractor relationship remains to be seen.

### **NGO Subcontracting and Secrecy**

From the beginning, many of the details related to European links to funding for Palestinian NGOs were hidden in extraordinary secrecy.

For many years, no reports or evaluations were made public, and there were no government presentations, debates in parliament, or oversight. The only publicly available document on the EU NGO grant-making process is a partially leaked protocol from a 1999 EU meeting on grantees and projects (European Commission, 1999). The extraordinary and extreme secrecy highlights the anomalous nature of funding for Palestinian NGOs and the importance attached to protecting the relationships from external scrutiny.

Officials offer various justifications in denying freedom of information (FOI) requests for the relevant documents (often after long delays). These include “danger to public security,” privacy, and proprietary (commercial) factors. As a result, members of parliament, journalists, researchers, and others are unable to examine the funding processes independently. Potential conflicts of interests cannot be investigated, such as personal connections between government officials and the NGO. A 2014 EC report acknowledged concerns regarding “a significant level of corruption through ‘easy to get funds,’ lack of monitoring and poor results,” but these concerns did not affect policy (European Commission, 2014). The 2021 decision by OLAF to open an investigation could lead to a major change in these policies, although this process is also conducted behind closed doors.

On occasion, members of parliament, including MEPs, have highlighted and criticized this extreme secrecy (European Parliament, 2010; Van Buitenen, 2008). The EC’s responses ignored the questions and did not provide the requested information. Regarding evaluations, EC Commissioner Ferrero-Waldner made a vague statement that the EC ensures “regular monitoring of [NGO] projects” through annual external checks performed by a “team mandated by headquarters,” and “ad hoc specific evaluations.” She also declared that PfP grantees were “pro peace, pro dialogue, pro mutual understanding,” and that the evaluations

concluded that the funding “was appropriate and produced positive results,” but documents, if any, to support these claims remain hidden (European Parliament, 2006). In many cases, not limited to the Palestinian NGOs funded by Europe, donors rely on self-reporting by the recipient organizations, and lack the resources to examine these reports independently. This is especially true in closed societies where outsiders in particular are unable to trace the use of donor funds.

As a general practice, and without referencing the specific Palestinian NGO case, the absence of NGO funding transparency was addressed in a special report of the European Court of Auditors (ECA) from December 2018. According to the ECA, the EU “was not sufficiently transparent regarding the implementation of EU funds by NGOs” and “does not have comprehensive information on all NGOs supported” by taxpayer funds. In the case of Palestinian NGO funding, this is particularly severe (European Court of Auditors, 2018). A single official based in the Representative office for the Palestinians in Jerusalem is charged with evaluations, among other duties. As noted in an EU report, this office “is critically understaffed and has very limited resources (one person) for supporting the demanding process of dialogue and development of partnerships with Civil Society... without adequate resources to support the process across sectors and Sections, particularly for governance” (European Commission, 2014). The implications of this secrecy and lack of independent oversight were increasingly highlighted as the European funding for PFLP-linked NGOs became the focus of the Israeli government designations.

## Analysis

For over 20 years, the close relationships between European governments and a small group of Palestinian NGOs with unified political agendas highlight the role of these groups as policy subcontractors. The funding provided by approximately 60 distinct EU and European state



frameworks to Palestinian NGOs is characterized by repeat grants for the same recipients and clusters, year after year, despite changing circumstances. The absence of transparency means that decisions involving millions of euros are taken in frameworks that systematically lack (perhaps deliberately) the resources necessary to examine the NGO applicants independently. The official claim that funding is provided “for specific projects and well defined actions” and not for the NGOs is inconsistent with the facts (European Parliament, 2013).

The detailed analysis of European funding for Palestinian NGOs in this study highlights the frequency of repeat grants (vertical clustering), and the long-term subcontracting relationships. This process is reinforced by reliance on the self-reporting of the grantees themselves. A 2014 EU document on aid to the Palestinians (Evaluation of the European Union’s Cooperation with the occupied Palestinian territory and support to the Palestinian people) includes numerous references to “interviews with Civil Society” officials, including Al-Haq and PCHR (European Commission, 2014). In evaluation interviews, officials claim great success in meeting the requirements specified in the contracts, thereby justifying funding in the next cycle, and so forth, indefinitely.

In addition to the repeat grants, European funding for Palestinian NGOs is characterized by horizontal or lateral clustering and reinforcement across different donor frameworks, so that “favored” recipients in the EU or a specific country leverage these relationships in order to gain additional funding at the same time from the other frameworks. After receiving funding from the EU beginning in 1999, ARIJ/LRC succeeded in gaining support from the governments of Sweden, Denmark, the Netherlands, and Switzerland (individually and through the NDC between 2009 and 2013). Al-Haq’s grants from Norway in 2007 were followed by funding from at least seven other frameworks, including Ireland, Germany, Italy, and the EU. In addition, funding for the UAWC expanded

from the EU in 2011 to the Netherlands in 2013, and then France, Germany, Italy, Norway, and the Andalucia regional government in Spain. Over the years, Miftah has been supported by 14 different European government frameworks, including three from Germany, as well as two in the UK and two in Ireland. Many of the other Palestinian NGO recipients of European funds draw on five, six, or seven different funders, highlighting the lack of diversity, and suggesting that in their policies, officials from the European frameworks “follow the leader” or reflect a process of group think in decision making.

### **Counterproductive Political Impacts of European NGO Subcontracting**

The Palestinian NGOs supported by the European governments play a central role in promoting soft-power confrontations with Israel in the context of the conflict, including boycotts and allegations of violations in the realms of human rights and international law (lawfare) centered on the International Criminal Court. The most frequent grantees such as Al-Haq, PCHR, Addameer, Al-Dameer, DCIP, and ARIJ are particularly active in these advocacy agendas across a wide range of platforms.

For example, in 2014 and 2016, Al-Dameer (a member of the PFLP-linked NGO network) received two multi-year EU grants (€100,707 and €446,482), both labeled “Contributing to the respect, protection and promotion of the right to freedom of association in the Gaza Strip.” There is no evidence that the activities ostensibly performed under these grants had any impact on the Hamas-controlled government in Gaza, while Al-Dameer’s advocacy targeting Israel has been very visible. Under the banner of human rights defenders, the NGO sponsors numerous events campaigning on “international accountability mechanisms” and on behalf of Palestinians jailed by Israel for involvement in terror.

Similarly, in 2017, DCIP (another member of the PFLP-linked NGO network supported for many years by European mechanisms,

including EIDHR) was among the recipients of a €981,298 grant under the heading of “Prevention, Mitigation and Rehabilitation for Palestinian Children Exposed to Torture and other Cruel, Inhuman or Degrading Treatment.” Analysis of DCIP social media posts and other activities shows that a significant portion of the funding is used for lobbying and for events around the world in the context of a political campaign targeting Israel. DCIP made these allegations against Israel in many significant venues around the world, including media exposure and parliamentary events in Australia, Canada, and Europe, as well as in the US Congress, where Representative Betty McCollum (D-MN) also introduced legislation based on the NGO’s claims. In sharp contrast, there is no indication of DCIP programming aimed at improving the treatment of children vis-à-vis the Palestinian Authority or Hamas, or in preventing the exploitation of minors by terror organizations.

In some cases that might appear to be non-political, such as support for the Union of Agricultural Workers Committees (UAWC), health (UHC and HWC), and women’s rights (UPWC), an examination of the agendas and activities of the grantees also demonstrates intensive political campaigning. These include sponsorship and participation in boycott events, statements submitted to international bodies such as the United Nations, appearances before parliamentary committees, social media posts, and similar involvement.

For the EU member states and taxpayers, these frameworks and relationships raise numerous issues and questions under the heading of “value for money” (NGO Monitor, 2016b). There are no systematic or detailed attempts to evaluate how, if at all, the objectives of “a two-state solution with an independent, democratic, viable and contiguous Palestinian state” have been advanced. Palestinian politics and society remain deeply divided, far removed from democratic principles and processes, and no closer to acceptance of the legitimacy of

Israel (regardless of borders) than in 1948. As demonstrated, the NGOs supported by Europe pursue policies that fuel the conflict, particularly in the case of organizations affiliated with the PFLP, and the focus on terror links involving these NGOs has intensified the scrutiny and debate. But the lack of results has not led to changes in European policy, or even a serious discussion.

### **NGO Funding and the Absence of Due Diligence**

The intense clustering of European government grants to a small group of well-connected Palestinian NGOs reflects the degree of internal referencing, in contrast to due diligence involving each proposal cycle and contract. In the absence of documentation on decision making processes (reflecting the high level of secrecy and the lack of transparency), systematic evidence is not available. However, the public comments and responses from European officials, particularly when responding to parliamentary critics and in correspondence, are indications of reliance on ostensible evaluations made in other funding frameworks and by officials from other governments.

For example, in the Netherlands, when confronted with evidence that the UAWC—one of the Palestinian NGOs that received numerous grants over the years—was affiliated with the PFLP terror group, officials claimed, “Before starting cooperation with UAWC in 2013, we conducted extensive consultations with other UAWC donors. Since 2013, other donors have also conducted due diligence and carried out screenings...None of these screenings concluded that UAWC should be excluded from funding” (Dutch Ministry of Foreign Affairs, 2020). At least eight other European governments, including the EU, fund the UAWC, but none of the details of these consultations, “screenings,” and due diligence are available, making it impossible to evaluate their contents.

Similarly, when the Netherlands Minister for Foreign Trade and Development Cooperation

was asked by Members of Parliament to explain the funding for Al Mezan, another PFLP-linked NGO, over two decades, her response focused on the other funding sources, including the UN, the EU, Sweden, Norway and Denmark, and Switzerland (Kaag, 2020a). She quoted the denials of the organization (self-reporting), rather than credible and verifiable independent evaluations. Responding to questions related to overall assessments of NGO funding policies, she stated: “The Dutch programs in the Palestinian areas will be implemented through international organizations, such as the United Nations.... Organizations with which the Netherlands cooperates directly are pre-assessed on their ability to achieve intended goals and to manage Dutch funds responsibly” (Kaag, 2020b).<sup>4</sup>

When parallel issues were raised in Norway, Dag Inge Ulstein, Minister of International Development, responded: “To date, we have not uncovered conclusive information that the Union of Agricultural Work Committees (UAWC), as an organisation, is involved in or supports acts of terrorism. Allegations of such links have been refuted previously, including in the Australian study” (Royal Norwegian Ministry of Foreign Affairs, 2020).<sup>5</sup> In 2018, Foreign Minister Ine Eriksen Sørreide responded to a parliamentary question by listing a number of general evaluations carried out by Norad aid agency and the Office of the Auditor General (Sørreide, 2018). However, no details are available and none of the evaluations have been made public. In 2021, the reaction of the Spanish Foreign Minister to information regarding PFLP links of grantees was similar (Bau, 2020). The prominence of terror-linked grantees and the avoidance of substantive responses, including to the Israeli government designations in 2021, further highlight the absence of due diligence and accountability.

## Conclusions

Analysis of the 20-year history of European government funding for Palestinian NGOs reveals a number of important findings that

contrast sharply with the declared objectives. Of particular importance is the constancy of this funding for a relatively small group of organizations, both in terms of the repetitive grants that are provided over numerous funding cycles (vertical clustering), and the practice by the numerous government frameworks (direct and indirect) in supporting the same recipients (horizontal clustering). The primacy of political subcontracting is reflected in the detailed patterns and close examination of the evidence, in contrast to official declarations and reports.

Although the label “civil society” is used repeatedly by European officials to describe and justify these policies, the term is ambiguous and problematic in the Palestinian framework. In closed systems, as is the case in both the Palestinian Authority in the West Bank as well as Hamas-controlled Gaza, these organizations would not be able to operate or receive funding without the approval of the authorities (the Palestinian Authority and Hamas, respectively). In addition, the centrality for the PFLP’s NGO network in European policy is particularly inconsistent with the concept of civil society.

These processes and relationships, through which hundreds of millions of euros were provided by European governments to Palestinian NGOs during a twenty-year period, have and continue to have substantial impacts. Instead of advancing the formal objectives of promoting peace, economic development, Palestinian democracy, and rapprochement, these policies sustained the conflict through campaigns alleging Israeli violations of “international law” and “apartheid,” as well as active participation in lawfare and boycott campaigns.

The application of the political subcontractor model clarifies many of the otherwise inexplicable and inconsistent explanations for the deeply entrenched relationships between European governments and the selected group of Palestinian NGOs. When viewed from this perspective, the exchange of state funds for NGO

services, through means that European officials and diplomats are unable to pursue themselves, is consistent with the evidence and the evolution of these policies. Although European support did not begin as a form of subcontracting, as officials recognized the influence and capabilities of the NGOs, these links evolved and strengthened, while benefiting from the image of altruism and independent civil society.

The subcontractor model also helps explain the unusual scale of European support for Palestinian NGOs, the small number of organizations involved, the overlapping contracts and the clustering, both vertical and horizontal, and the intense secrecy—all of which are unique when compared to other civil society relationships. European officials give very high priority to involvement (or at least the perception of involvement) in the Palestinian-Israeli arena, and for the reasons explained in this analysis, close cooperation with the specific group of NGOs provides an important addition to the otherwise limited sources of influence. From this perspective, the actual impacts on officially proclaimed objectives (Palestinian democracy, peace) are less important than this influence.

After twenty years, however, with little to show for hundreds of millions of euros in budgetary allocations, and in light of recent revelations of terror links for a number of Palestinian NGO subcontractors, it might become more difficult to justify these relationships.

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## References

- AALEP—Association of Accredited Public Policy Advocates to the European Union (AALEP). (2016). Russian Gongos and NGOs. <http://www.aalep.eu/russian-gongos-and-ngos>
- Australian Minister of Foreign Affairs. (2011). Union of Agricultural Work Committees. Media release. <https://bit.ly/3a2x3Ok>
- Bau, A. M. (2020, August 17). Letter to NGO Monitor. <https://bit.ly/3mmnXSs>
- Bendell, J., & Cox, P. (2006). The donor accountability agenda. In L. Jordan & P. Van Tuijl (Eds.), *NGO accountability: Politics, principles and innovations* (pp. 109-126). London: Earthscan.
- Bicchi, F. (2013). Information exchanges, diplomatic networks and the construction of European knowledge in European Union foreign policy. *Cooperation and Conflict*, 49, 239-259.
- Birzeit University. (2016). Mid-term review of the management of the Human Rights and IHL secretariat. Ramallah. <https://bit.ly/2ZNOfFR>
- Bové, L. (2021, August 3). Belgie zet door met heikele steun aan Palestijnse organisaties. *De Tijd*. <https://bit.ly/3ESnQpf> [in Dutch].
- Dupuy, K. E., Ron, J., & Prakash, A. (2015). Who survived? Ethiopia's regulatory crackdown on foreign-funded NGOs. *Review of International Political Economy*, 22(2), 419-456.
- Dutch Ministry of Foreign Affairs. (2020, July 20). Letter to UK Lawyers for Israel.
- EuropeAid. (2014). Calls for proposals & procurement notices, EU Partnership for Peace Programme (PfPP). <https://tinyurl.com/etbd8v9z>
- European Commission. (1999). Meeting protocols of the ad-hoc selection committee for people to people/permanent status issues projects in support of the Middle East peace process, budget line B7-4100. <https://bit.ly/3iv4uxD>
- European Commission. (2014). Evaluation of the European Union's cooperation with the occupied Palestinian territory and support to the Palestinian people 2008-2013—Final Report, Volume 1. <https://bit.ly/3svJ618>
- European Commission. (2018). Implementing decision on the annual action programme in favour of Palestine for 2018 (including one action on budget 2019 and 2020). Brussels. <https://bit.ly/3aCYCOo>
- European Council. (2000). The Commission and non-governmental organizations: Building a stronger partnership. <https://bit.ly/30on2tm>
- European Court of Auditors. (2018). Transparency of EU funds implemented by NGOs: More effort needed. <https://bit.ly/3otsRzz>
- European Institute of the Mediterranean. (2020). Euromed survey of experts and actors—Civil society and social movements in the Euro-Mediterranean region. Barcelona. <https://bit.ly/3l7ytO5>
- European Parliament. (2006). Answers to parliamentary questions. <https://bit.ly/2YMKqja>

- European Parliament. (2010). Public information about the funding provided to third-country NGOs by the EU. <https://bit.ly/3A43JSb>
- European Parliament. (2013). Answers given by High Representative/Vice President Ashton on behalf of the Commission. <https://tinyurl.com/wwehdxb>
- European Parliament. (2015, November 30). Answer given by Vice-President Mogherini on behalf of the Commission to parliamentary questions. <https://bit.ly/3a6A28k>
- European Parliament. (2021). 2019 discharge: EU general budget—Commission and executive agencies 2020/2140(DEC). <https://bit.ly/2YmcLNt>
- European Union. (2021). Middle East peace process. External Action Service. Brussels. <https://bit.ly/3ou2SYT>
- Feith, D. (2021). A new Palestinian Authority NGO decree might halt US aid to the West Bank and Gaza. *Mideast Security and Policy Studies* No. 197, BESA Center for Strategic Studies, Bar Ilan University.
- Frane, A. (2008). Civil society organisations in a knowledge based society. In B. Kohler-Koch, D. De Bievre, & W. Malone (Eds.), *Opening EU-governance to civil society: Gains and challenges*. CONNEX Report Series 5, p. 324.
- Harkov, L. (2020, July 2). Borrell: No proof of EU-funded NGOs working with Palestinian terror groups. *Jerusalem Post*. <https://bit.ly/3BNinOK>
- Harkov, L. (2021, May 6). Four Palestinians to be charged with diverting European aid to terrorism. *Jerusalem Post*. <https://bit.ly/3uBenP7>
- High Court of Justice, Israel. (2007). Case #5182/07. Unofficial translation, 2016. <https://bit.ly/3iv6y8R>
- Hollis, R. (2013). Europe. In J. Peters & D. Newman (Eds.), *The Routledge handbook on the Israeli–Palestinian conflict* (pp. 336–345). London.
- Israel Ministry of Defense. (2021). The Minister of Defense designated six organizations of “Popular Front for the Liberation of Palestine” as terror organizations. National Bureau for Counter Terror Financing of Israel. <https://nbctf.mod.gov.il/en/Pages/211021EN.aspx>
- Israel Ministry of Foreign Affairs. (2021). ISA: European funds intended for humanitarian activity diverted to financing terrorism. <https://bit.ly/3l0Ms89>
- Israel Prime Minister’s Office (PMO). (2019). The ties between NGOs promoting BDS and terror organizations. Jerusalem. [https://www.gov.il/en/departments/general/terrorists\\_in\\_suits](https://www.gov.il/en/departments/general/terrorists_in_suits)
- Jamal, A. A. (2007). *Barriers to Democracy*. Princeton University Press.
- Jewish News Service. (2019, December 31). Palestinian NGOs reject EU assistance over refusal to renounce ties to terrorism. <https://bit.ly/3l50vcT>
- Kaag, S. (2020a, September 8). Dutch Support for Palestinian NGOs. <https://tinyurl.com/sfh5mhuy> [in Dutch].
- Kaag, S. (2020b, September 8). Letter to President of the Netherlands House of Representatives. <https://zoek.officielebekendmakingen.nl/kst-23432-478.html> [in Dutch].
- Kaag, S. (2021, May 12). Government letter to Parliament: Financing specific outstanding payments from farmers and contractors in the Palestinian territories, 23432-482. Foreign Trade and Development Cooperation. <https://bit.ly/3EPeCKi> [in Dutch].
- Keck, M. E., & Sikkink, K. (1998). *Activists beyond borders: Advocacy networks in international politics*. Ithaca: Cornell University Press.
- Levitt, M. (2021, November 4). A blurred line between civil society and terrorism: Examining charges of Palestinian NGOs funding the PFLP. *Policy Notes* No. 112. Washington Institute For Near East Policy. <https://bit.ly/30170pp>
- McMahon, P. (2017). *The NGO game: Post-conflict peacebuilding in the Balkans and beyond*. Cornell University Press.
- Miftah. (2019). Financial Statements: Independent Auditor’s Report. <https://bit.ly/3D8KhFP>
- Muslih, M. (1993). Palestinian civil society. *Middle East Journal* 47(2).
- NGO Monitor. (2016). Value for money? <https://bit.ly/3lf6dZE>
- NGO Monitor. (2019, December 24). Terror-linked and boycott promoting NGOs behind potential ICC investigation. <https://bit.ly/3uNBA0x>
- NGO Monitor. (2020a). Defense for Children International-Palestine’s ties to the PFLP terror group. [http://ngo-monitor.org/pdf/DCIP\\_0120.pdf](http://ngo-monitor.org/pdf/DCIP_0120.pdf)
- NGO Monitor. (2020b, January 27). Palestinian Centre for Human Right’s links to the PFLP terror group. <https://bit.ly/2WMJomX>
- NGO Monitor. (2020c, May 21). PNGO’s ties to Palestinian terror groups. <https://bit.ly/3leHzlM>
- NGO Monitor. (2020d, July 15). EU funding to terror-linked Palestinian NGOs since 2011. <https://bit.ly/3oYktIH>
- NGO Monitor. (2020e, August 21). EU grants to NGOs in Jerusalem: “Protect the Palestinian identity of the city.” <https://www.ngo-monitor.org/reports/eu-grants-jerusalem/>
- NGO Monitor. (2021a, March 14). Consolidated Palestinian funding database. <https://bit.ly/2YsA5JD>
- NGO Monitor. (2021b, May 11). Health Work Committees. <https://bit.ly/3uJVAKK>
- Palestinian National Authority. (2021). General Administration of Public Affairs and Non-Governmental Organizations, Interior Ministry. <https://ngo.moi.gov.ps/Home.aspx>
- Pardo, S., & Peters, J. (2009). *Uneasy neighbors: Israel and the European Union*. Lexington Books.
- Quer, G. (2020). Behind the BDS discourse: Furthering anti-normalization. *Israel Journal of Foreign Affairs*, 14(1), 69–79. <https://doi.org/10.1080/23739770.20.1769931>
- Rabbani, M. (1994). Palestinian human rights: Activism under Israeli occupation: The case of Al-Haq. *Arab Studies Quarterly*, 16(2), 27–52.
- Rickenbacher, D. (2017). Arab states, Arab interest groups and anti-Zionist movements in Western Europe and the US. <https://doi.org/10.5167/uzh-153223>

- Rieff, D. (2010, August 3). How NGOs became pawns in the war on terror. *The New Republic*.
- Royal Norwegian Ministry of Foreign Affairs. (2020, October 5). Letter to NGO Monitor.
- Shafi, S. A. (2004). Civil society and political elites in Palestine and the role of international donors: A Palestinian view. EuroMeSCo paper 33. <https://bit.ly/3FgPw8p>. Cited by Feith, 2021.
- Siebelt, P. (2017). *Modus operandi: De pro-Palestijnse lobby en de kruistochten van de kerken*. Uitgeverij Aspekt [in Dutch].
- Sørdeide, I. E. (2018, August 21). Response to parliamentary question. <https://bit.ly/3aa4ezN> [in Norwegian].
- Steinberg, G. M. (2016). EU foreign policy and the role of NGOs: The Arab-Israeli conflict as a case study. *European Foreign Affairs Review*, 21(2).
- Steinberg, G. M. (2020). The failed European experiment in pooled funding for Palestinian NGOs. <https://bit.ly/2YCHBkO>
- Steinberg, G. M., & Wertman, B. (2018). Value clash: Civil society, foreign funding, and national sovereignty. *Global Governance*, 24(1).
- Sternberg, E. (2010). NGOs vs. civil society: Reflections on the illiberal, the illegitimate and the unaccountable. *Economic Affairs*, 30(3).
- Swedish Ministry for Foreign Affairs. (2019, November 1). Letter to NGO Monitor.
- Swiss Confederation. (2018, May 8). Contract between the Federal Department of Foreign Affairs and Addameer Prisoner Support and Human Rights Association, p. 7. On file with NGO Monitor.
- Tovias, A. (2021). EU foreign policy on the Israeli–Palestinian conflict: A reevaluation. *Israel Journal of Foreign Affairs*, forthcoming.
- USAID, Near East Bureau. (1993). Palestinian institutional configurations in the West Bank and Gaza under four autonomy scenarios. Democratic Institutions Support Project.
- Union for the Mediterranean. (2020). Frequently asked questions on the Barcelona Process and the Union for the Mediterranean. <https://bit.ly/3ulzZcA>
- Van Buitenen, P. (2006). Parliamentary questions. European Parliament. May 19, 2006. Cited in Steinberg, G. (2008). *Europe's hidden hand: EU funding for political NGOs in the Arab-Israeli conflict*. NGO Monitor. <https://bit.ly/3bylEXr>
- Varheyli, O. (2020). Meeting of AFET Committee, European Parliament. <https://bit.ly/3lhRwoE>
- Voltolini, B. (2015). *Lobbying in EU foreign policy-making: The case of the Israeli-Palestinian conflict*. Routledge.
- Weiss, M. (2021, November 2). Proof is required to back up Israeli allegations against NGOs, says Coveney. *Irish Times*. <https://bit.ly/3GNlj1v>
- Welchman, L. (2021). *Al-Haq: A global history of the first Palestinian human rights organization*. Berkeley: University of California Press.
- Winer, S., & Ahren, R. (2018, July 17). EU: Israel spreads “disinformation” by alleging we fund terror-tied BDS efforts. *Times of Israel*. <https://bit.ly/3DeSqsm>

## Notes

- 1 In addition, a number of countries provide funds to UN agencies that in some cases fund the same NGOs. This source of indirect funding is generally not transparent.
- 2 The publication of financial reports including donor details by Miftah and Al Mezan are exceptional. Most of the other main Palestinian NGOs receiving European funds do not post this information.
- 3 Responses to requests sent to EU and government offices and officials, as well as from MEPs, for listings or total amounts of funding for Palestinian NGOs refer to the absence of such information. When the author of this article presented NGO Monitor’s data on EIDHR grants before the European Union’s Mashrek/Maghreb Working Group in 2014, a number of participants expressed surprise.
- 4 Minister Sigrid Kaag was employed as a senior official in UNRWA, and is married to Anis al-Qaq—a close ally, ambassador, and deputy minister under Yasir Arafat. See Sigrid Kaag in vijf vragen (Sigrid Kaag in five questions), *Nieuw Israëlietisch Weekblad*, October 27, 2017, <https://niw.nl/sigrid-kaag-in-vijf-vragen-555/> [in Dutch].
- 5 This was apparently a reference to a 2011 Australian statement that “there is no evidence to support claims...that funding to a Palestinian NGO, the Union of Agricultural Work Committees (UAWC) was in violation of section 21 of the Charter of the United Nations Act, 1945” (Australian Minister of Foreign Affairs, 2011). This narrow statement and the referral to the UN, which does not list the PFLP as a terror organization, avoids the substantive issues.



# STRATEGIC ASSESSMENT

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