

**Consolidated Review of Preliminary Findings  
Regarding Médecins Sans Frontières (France,  
Belgium, Spain and Netherlands) – Registration  
Process under Government Resolution 2542**

**December 2025**

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# **Executive Summary**

All information presented below is based both on data and documents provided by the organization itself as part of the registration application process, and on information published in open sources across the web (including official websites and other public publications). No separate examination was conducted to verify or validate the data and information presented. The information was provided by the organization for the purpose of submitting a registration application in accordance with the inter-ministerial procedure and Government Resolution 2542. It should be emphasized that the information presented below constitutes only a summary of the details provided and presented, and therefore, the organization's review should not rely solely on the information contained in this draft, but requires a thorough examination and review of all organizational documents as submitted.

## **Médecins Sans Frontières (MSF): Structure, Principles, and Key Organizations**

According to information published on the official websites of the organization, Médecins Sans Frontières (MSF) is an international humanitarian entity established in France in 1971. Its mission is to deliver cross-border medical aid to individuals in regions affected by conflict, crisis, or disaster, without any form of discrimination. MSF operates through four main branches: France, Belgium, Netherlands, and Spain. Each branch functions as an independent operational center, funded almost entirely by private donations.

In accordance with Government Resolution 2542 (hereinafter: "the Government Resolution"), the organization's branches submitted registration applications on the following dates: MSF France on 4 July 2025, MSF Belgium on 24 July 2025, MSF Netherlands on 2 July 2025, and MSF Spain on 30 June 2025. The applications were reviewed in accordance with the Government Resolution and the "Guidelines for the Registration of Organizations and Issuance of Recommendations for Their Foreign Employees" (hereinafter- "The Guidelines") established pursuant to it. The review was conducted by the Inter-Ministerial Team (hereinafter: "the Inter-Ministerial Team"), which is responsible for evaluating registration applications and ensuring compliance with all regulatory requirements.

In the course of reviewing the activities of the four principal Médecins Sans Frontières (MSF) entities that submitted applications for registration, a number of material findings were identified. The information compiled and presented in this review is derived from the professional assessments and considered opinions of the members of the Inter-Ministerial Team.

The review concluded that none of the organizations fulfilled the registration requirements as prescribed. In particular, all four MSF entities declined to provide comprehensive staff lists—including details of Palestinian employees—as explicitly mandated by the registration guidelines. Following a thorough assessment, it was determined that the organizations in question operate under the pretext of humanitarian activity, while in practice advancing an extreme anti-Israeli narrative, maintaining affiliations with terrorist entities, promoting boycotts, and willfully disregarding the registration obligations.

The following Executive Summary consolidates the principal findings, and the reader of this report is invited to consult the designated chapters, which set forth in detail the findings regarding the four MSF branches. The key findings are as follows:

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## 1. **Delegitimization of Israel**

The review conducted by the Inter-Ministerial Team revealed serious findings, including official publications by the organization that far exceed the bounds of legitimate criticism and constitute a deliberate campaign to undermine and deny the legitimacy of the State of Israel. This is not mere rhetoric, but a systematic pattern aimed at depriving Israel of its fundamental right to exist as a sovereign state and as a member of the international community. Such narratives, when disseminated by an international humanitarian body, carry dangerous implications: they undermine Israel's legal standing, fuel hostile initiatives in diplomatic and legal arenas, and serve as a catalyst for campaigns of boycotts, sanctions, and isolation. In accordance with Government Resolution No. 2542, pursuant to Section 7.1(8) of the Guidelines, this conduct is not only unacceptable, it is expressly defined as grounds for the imposition of severe administrative measures.

The Inter-Ministerial Team conducted a comprehensive review of the organization's official websites and statements and identified repeated publications that constitute clear delegitimization of the State of Israel. These publications do not fall within the scope of legitimate criticism of policies or actions; rather, they present extreme and unfounded allegations portraying Israel as a state committing crimes against humanity. Selected examples of such publications are as follows:

- Use of terms such as '**genocidal war**,' '**genocide**,' and '**ethnic cleansing**.' These terms do not constitute legitimate criticism of policy or military actions; rather, they attribute to the State of Israel an intent to systematically destroy a population.
- The use of phrases such as '**systematic extermination**' and '**deliberate siege and starvation**' serves to depict Israel as a state deliberately perpetrating crimes against a civilian population, as opposed to a state engaged in an armed conflict in defense of its sovereign rights.

Set forth below are selected illustrative excerpts drawn from official statements disseminated across online platforms by the organization. These statements have been translated from their original language into English. (A comprehensive and detailed analysis of this matter is provided in the substantive sections of the report):

- "MSF France calls on the French government to take immediate measures to put an end to the **genocide** perpetrated by the Israeli authorities in Gaza... MSF denounces the **genocidal war** waged against the Palestinian population, **marked by mass killings, the systematic destruction of civilian infrastructure, a deliberate siege and famine, as well as the forced displacement of the population, described as ethnic cleansing.**"<sup>1</sup>*
- "Israel's response has taken the form of an almost uninterrupted **genocidal campaign** of bombardments with an intensity never before seen...are a further*

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<sup>1</sup> See publication on the official website of Médecins Sans Frontières France (MSF-France): <https://www.msf.fr/actualites/gaza-les-medecins-ne-peuvent-pas-arreter-un-genocide-nos-dirigeants-oui>  
September 5, 2025, main page.

*step in the campaign of ethnic cleansing of Palestinians....a genocidal war waged by the Israeli army and ethnic cleansing...”<sup>2</sup>*

- c. *“MSF calls on France to ensure that no French weapons or ammunition are used by the Israeli army in its **genocidal war** in Gaza.”<sup>3</sup>*
- d. *“The war waged by Israel against the population of Gaza is a genocidal war, marked by mass killings, the systematic destruction of civilian infrastructure, a deliberate siege and famine, as well as the forced displacement of the population, described as ethnic cleansing.”<sup>4</sup>*
- e. *“Israeli evacuation orders are a tool in a campaign of ethnic cleansing that turns Gaza into a living hell for Palestinians.”<sup>5</sup>*
- f. *“**Stop the genocide**.... For almost two years, we have witnessed the destruction of healthcare facilities, the silencing of journalists, and aid workers buried under the rubble. While Israel continues to ignore international law, **the only witnesses to their genocidal campaign are deliberately targeted**. This must stop now.”<sup>6</sup>*
- g. *“What is happening in Gaza is not just a humanitarian disaster. **It is the systematic extermination of a people**.”<sup>7</sup>*
- h. *“More than 500 people have now been killed at these distribution points... **This “aid” is soaked in blood**...”<sup>8</sup>*
- i. *“Israel’s **genocidal campaign** in Gaza has destroyed most of the means of livelihood for Palestinians in the Strip, and Israeli authorities **continue to deny the population its most basic needs for survival**. The **genocide in Gaza** has been carried out not only through killings, detentions, and direct attacks, but also through the **systematic destruction of infrastructure and the denial of means of survival**: food, water, shelter, healthcare, fuel, and livelihoods....Gaza is in ruins. The impact of such **devastation and destruction of public and private infrastructure, including the health system**, will require a titanic task of reconstruction and recovery. Israeli forces have **systematically attacked Gaza’s health system**, bombing hospitals, raiding medical facilities, and endangering the lives of staff and patients, accompanied by the persecution of medical personnel.”<sup>9</sup>*

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<sup>2</sup> See response to public questions on the MSF France website (2024):  
<https://www.msf.fr/gaza-nos-reponses-a-vos-questions>

<sup>3</sup> See source no. 1.

<sup>4</sup> See the organization’s statement on the official MSF Belgium website: (16 June 2025):  
<https://www.msf-azg.be/fr/news/lhypocrisie-des-gouvernements-europ%C3%A9ens-exacerbe-les-souffrances-%C3%A0-gaza%E2%80%AF%E2%80%AF>

<sup>5</sup> See article from the organization’s website: (28 May 2025):  
<https://www.msf-azg.be/fr/news/gaza-isra%C3%ABl-et-la-guerre-psychologique-des-d%C3%A9placements>

<sup>6</sup> See publication from the official website of MSF Netherlands dated 18 September 2025 :  
[Zeven beelden van fotojournalist Mariam uit Gaza](#)

<sup>7</sup> See Source No. 1

<sup>8</sup> See publication from the official website of MSF Netherlands dated 11 July 2025:  
[Gaza: humanitaire hulp aangevallen en afgeknepen - Artsen zonder Grenzen](#)

<sup>9</sup> See publication on the official MSF Spain website dated December 8, 2025:

- j. *"The situation in the Strip has worsened even further after the blockade of humanitarian aid since last March 2. The Government of Israel has monopolized aid **"with a model that, far from alleviating suffering, perpetuates it,"** according to the statement read during the event. "It fragments, conditions, and politicizes assistance, violating the fundamental principles of neutrality, impartiality, and independence. **This is not a humanitarian aid system, it is the militarization of aid against a starving population.**"<sup>10</sup>*

## 2. **Calls for Boycott/Arms Embargo and Support for BDS Events**

The Inter-Ministerial team's review identified official publications and documented activities by MSF France that go beyond humanitarian advocacy and reflect an explicit organizational agenda promoting political boycotts and arms embargoes against Israel. These include public calls for France to halt military support and ensure no French weapons or ammunition are used by the IDF—demands aligned with BDS arms embargo campaigns. Documentation from the "X" network (BDS France – Paris Region) shows fundraising events ("Braderie pour Gaza") in Paris, where BDS promoted campaigns supporting MSF France. The combination of arms embargo calls and public support for BDS events demonstrates a clear intersection between humanitarian activity and political boycott messaging, contrary to the neutrality expected of humanitarian organizations. In accordance with section 7.1(7) of the Guidelines, such conduct constitutes clear grounds for considering denial of the organization's registration and including denial of the organization's registration and the removal of its foreign employees from Israel.

Set forth below are selected illustrative excerpts drawn from official statements disseminated across online platforms by the organization. These statements have been translated from their original language into English. (A comprehensive and detailed analysis of this matter is provided in the substantive sections of the report):

- a. *"MSF calls on France to ensure that no French weapons or ammunition are used by the Israeli army in its genocidal war in Gaza."*<sup>11</sup>
- b. *Publication on the "X" network by the BDS organization, regarding the humanitarian fundraising events – "Braderie pour Gaza" in Paris (September and December 2024), with the support of MSF France:*<sup>12</sup>

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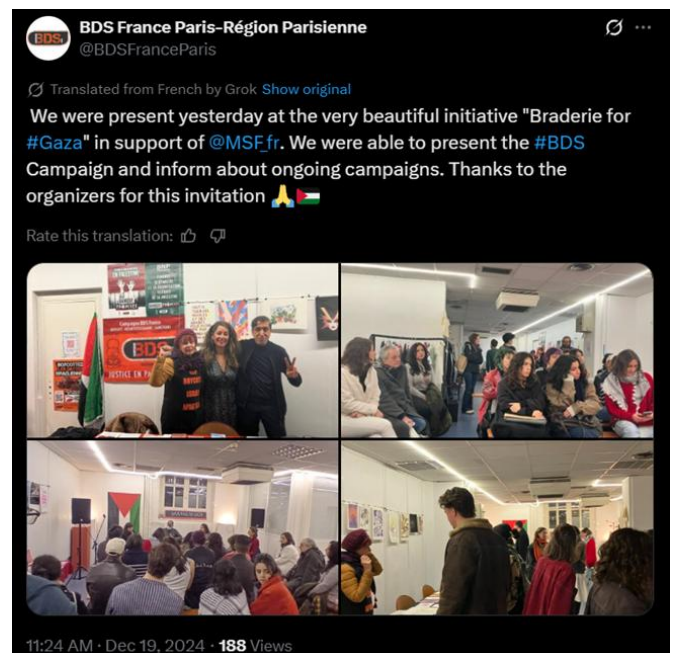
[Genocidio en Gaza | Médicos Sin Fronteras](#)

<sup>10</sup> See publication on the official MSF Spain website dated June 27, 2025:  
[Gaza: Seis ONG denuncian el sufrimiento extremo de la población | MSF](#)

<sup>11</sup> See source no. 1.

<sup>12</sup> See publication on the organization's account on the "X" network, during September and October 2024:

<https://x.com/BDSFranceParis/status/1839981049197052347>  
<https://x.com/BDSFranceParis/status/1869675098216473029>



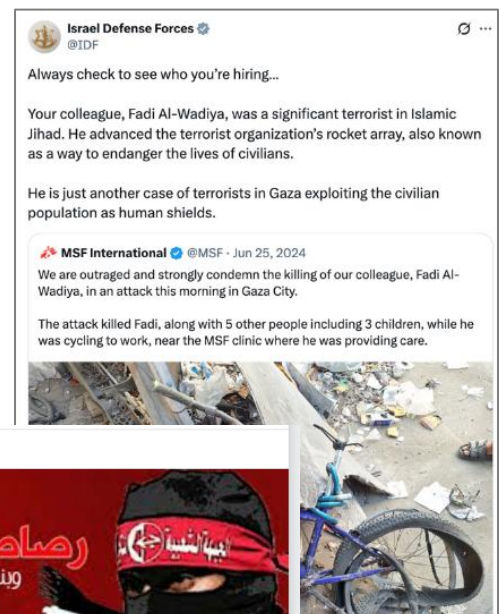
### 3. Indications of Links to Terrorist Organizations

The review conducted by the Inter-Ministerial Team has identified substantial indications of direct or indirect affiliations between MSF Belgium and terrorist organizations. Official documentation further demonstrates that an MSF employee in Gaza, Fadi Al-Wadiya, was revealed to be a senior operative of Islamic Jihad and an expert in rocket systems, as evidenced in the MSF Belgium report and corroborated by publications of the Israel Defense Forces (IDF) <sup>13</sup>.

Another employee, Mahmoud Abunejeila, referenced in MSF reports, has publicly expressed support for the Popular Front for the Liberation of Palestine (PFLP) <sup>14</sup>.

These findings, based on official sources, indicate not merely isolated incidents but an inherent risk of infiltration or manipulation of humanitarian operations by terrorist actors.

These serious findings constitute grounds for denying the organization's registration pursuant to Section 7.1(3) of the Guidelines, which provides as follows: 'The organization supports an armed struggle by an enemy state or a terrorist



<sup>13</sup> See Twitter post: (25 June 2024) Israel Defense Forces (@IDF) – <https://twitter.com/IDF/status/1805708917294420469>

<sup>14</sup> See official organization report on the death of Abu Nujeila (21 October 2023): [MSF doctors killed in strike on Al-Awda hospital in northern Gaza | Palestine | MSF](#)

organization against the State of Israel; the organization has been designated as a terrorist organization by the Minister of Defense pursuant to the Combating Terrorism Law, 5776-2016; a member, officeholder, partner, board member, or founder of the organization has been designated by the Minister of Defense as a terrorist operative pursuant to the Combating Terrorism Law (hereinafter: “Designated Terrorist Organization” and “Designated Terrorist Operative”); or the organization maintains or has maintained ties with a Designated Terrorist Organization or a Designated Terrorist Operative, including providing financial support to a Designated Terrorist Organization”.

#### **4. Denial of Israel’s Status as a Democratic/Jewish State**

The Inter-ministerial team’s review identified official publications and reports by MSF Belgium, such as “Inflicting Harm and Denying Care” (February 2025), which do not merely criticize specific policies or actions, but present extreme accusations that place Israel in the category of states committing crimes against humanity. These publications frame Israel as a systematically oppressive, colonial, and discriminatory state, including references to “apartheid,” “systemic oppression,” and “collective punishment”. Accordingly, the organization employs terminology whose intended purpose is to undermine the very status of the State of Israel as a democratic state.

The narrative formulated and promoted by the organization, with the intent to harm the State of Israel- portrays Israel as a non-democratic state, and constitutes a cynical attempt to undermine its international standing.

In accordance with section 7.1(1) of the Guidelines, such conduct constitutes clear grounds for denial of the organization’s registration and the removal of its foreign employees from Israel.

Attached below are selected quotations from the organization’s report entitled “Inflicting Harm and Denying Care,” as published and presented in 2025: <sup>15</sup>

- a. *“This increased wave of violence takes place in a **context of oppression** Palestinians endure under Israeli occupation, which recently the International Court of Justice (ICJ), on 19 July 2024, deemed unlawful and in clear violation of international prohibitions against **racial segregation and apartheid**.”<sup>16</sup>*
- b. *“Impediments to Palestinian access to healthcare by Israeli forces are part of a wider system of collective punishment imposed by Israel, **under the guise of its crackdown on armed Palestinian men**.”<sup>17</sup>*
- c. *“This surge in violence is not an isolated event, but part of a long history of **systemic oppression and colonization by Israel**.”<sup>18</sup>*

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<sup>15</sup> See report published on the organization’s website (the link contains the report): (6 February 2025): <https://press.msf-azg.be/cisjordanie-un-rapport-de-msf-documente-lescalade-des-attaques-israeliennes-et-entraves-aux-soins-contre-les-structures-medicales-et-les-soignants>

<sup>16</sup> See: MSF Report, p. 6

<sup>17</sup> See: MSF Report, p. 6

<sup>18</sup> See: MSF Report, p. 7

- d. *“The Israeli authorities have imposed a system that discriminates against Palestinians, restricts their movement, and denies them basic rights, including access to healthcare.”*<sup>19</sup>
- e. *“Israel, as the occupying power, is failing to fulfil its legal obligations under both International Humanitarian Law – which applies in situations of military occupation – **and human rights law, which upholds the right to life and prohibits the excessive and disproportionate use of force.**”*<sup>20</sup>
- f. *“We are being **collectively punished**, as is the rest of the West Bank. In fact, whenever something happens elsewhere in the West Bank, we always need to expect retaliation by settlers or Israeli forces.”*<sup>21</sup>

## 5. Funding and Operations

The Inter-ministerial team’s review found that all four MSF branches declare financial independence, relying almost entirely on private donations (France~98–99%, Spain~99%, Netherlands~99.6%, Belgium predominantly internal/private). However, this financial independence does not offset the pronounced politicization in official discourse: calls for arms embargoes, accusations of genocide, and claims of “militarization of aid” are all present in official channels. The combination of private funding and declared “neutrality” with the adoption of strong political messaging reveals a gap between humanitarian ethos and actual organizational conduct.

## 6. Political Statements by MSF Senior Official

Senior officials in MSF branches across several countries have issued statements that go beyond humanitarian description and amount to political condemnation. Among them, the CEO of MSF France described the siege in Gaza as “**collective punishment**” and “acts that constitute war crimes and genocide,” calling for sanctions; the General Director of MSF Netherlands characterized Israel’s actions as a **catalog of war crimes and participated in demonstrations with calls for boycott**; officials in Belgium and Spain provided testimonies about **severe conditions on the ground and defined the situation as war crimes.**<sup>22</sup>

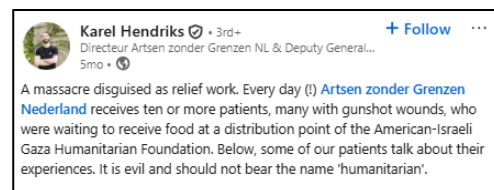
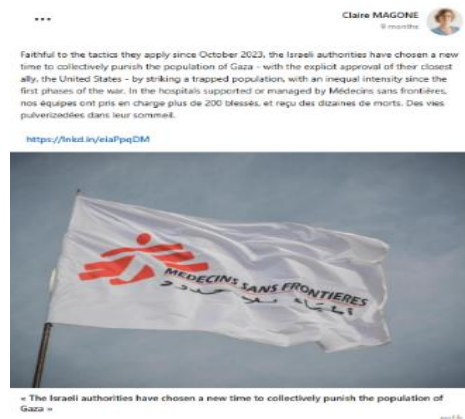
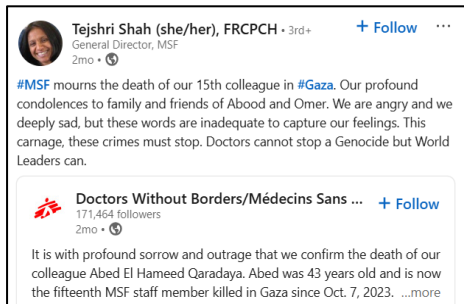
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<sup>19</sup> See: MSF Report, p. 7

<sup>20</sup> See: MSF Report, p. 8

<sup>21</sup> See: MSF Report, p. 37

<sup>22</sup> [Deutsche Tageszeitung - Almost impossible to deliver aid in Gaza, say top charities \(35\) Post | LinkedIn](#)



Based on the findings set forth in that document, there are clear indications that the organization’s activities pose a significant exposure to the security of the State of Israel, its sovereignty, and the safety of its residents. Consequently, the overall risk level associated with MSF’s operations is assessed as extremely high.

This, alongside the organization’s failure to comply with basic registration requirements, most notably its refusal to provide full lists of employees as mandated, further amplifies the exposure and elevates the assessed risk level to the security of the State of Israel, due to the lack of transparency.

These findings reflect a significant deviation from the principles of neutrality, impartiality, and independence expected of humanitarian actors.

It is important to emphasize that MSF is an international umbrella organization, comprising numerous branches that all operate under a unified policy and agenda. This agenda is not exclusively humanitarian, but also includes explicit political advocacy—defined by MSF as “bearing witness and raising the alarm”—which is a core organizational mission across all branches. The problematic patterns identified in the reviewed branches are also present in other branches, including MSF Greece, which, although it did not submit a formal registration application, operates under the Operational Centre Barcelona-Athens (OCBA) and has exhibited similarly problematic statements and conduct.

In light of the foregoing, after reviewing all the information available to the team, the Inter-Ministerial Team has determined that there is concern that the

**organization: denies the existence of the State of Israel as a Jewish and democratic state; maintains connections with a designated terrorist organization; serve as a cover for illegal activities ; promotes delegitimization activity; and calls for a boycott of the State of Israel. These findings may warrant the rejection of the application, in accordance with Sections 7.1(1), 7.1(3), 7.1(7) and 7.1(8) of the Guidelines.**

As an alternative solution, it is recommended to expand the entry of professionals and teams from other health and medical organizations that meet the regulatory requirements and uphold the principles of neutrality and transparency. This expansion will ensure the continuity of humanitarian medical aid, while guaranteeing full compliance with legal requirements and international standards.

## **Key Findings -Medecins Sans Frontieres France**

### **Part A – General Introduction**

#### **General background on the organization:**

Médecins Sans Frontières France (hereinafter: "MSF France") was founded in France in December 1971 following the Biafra war, by doctors and journalists who sought to provide cross-border medical assistance to anyone without discrimination. The organization currently operates in more than 70 countries and runs an operational center in Paris (OCP – Operational Centre Paris). Its vision is based on the right to medical care for every person, and the organization was awarded the Nobel Peace Prize in 1999.

MSF France is registered as an independent association and is managed by a board of directors of 15 members elected at the General Assembly, most of whom have medical backgrounds. The president, as of 2025, is Dr. Isabelle Defourny, and she is the only one who receives limited remuneration; the other board members act on a voluntary basis. Day-to-day management is carried out by a CEO and professional staff, and the organization is subject to external audit, by the accounting firm Ernst & Young.

#### **Activities and Funding**

MSF France operates Field Hospitals, mobile clinics and vaccination programs in conflict- and crisis-affected areas, alongside mental health and nutritional assistance. The organization funds its activities mainly from private donations (98%–99% of the budget), and maintains independence from governments. In 2024 its revenues totaled approximately €585.8 million, of which less than 0.5% came from neutral public institutions. The organization does not receive funding from states involved in conflicts, and no donations were received from a foreign state entity for its activities in Israel or the territories.

#### **Activities in the West Bank and Gaza**

MSF France is currently active in the West Bank and the Gaza Strip, mainly providing medical care to conflict victims, urgent surgeries and psychological support. The activity is carried out in accordance with principles of neutrality and independence, without governmental funding.

#### **Status of the organization's application:**

MSF France approached the inter-ministerial team as part of the registration process, and submitted its application for registration on 4 July 2025. Since then, the organization has provided most of the required information needed to its registration process, but as of today has not yet submitted the list of all employees involved in the management and implementation of the humanitarian program. The required list should include Palestinian employees, with full identification details—as explicitly required by the “*Guidelines for the Registration of Organizations and Issuance of Recommendations for Their Foreign Employees*”.

In response to the requirement by the Inter-Ministerial team to complete details regarding the employee list dated 13 August 2025, the organization stated that it is prepared to provide identification details of senior officials only (such as CEO, Chair, CFO, COO), but refuses to provide a full list of all employees. The organization explained its refusal to provide employee details in a official letter dated 27 August 2025:

*"...At the same time, we are bound by obligations to safeguard the rights and protection of our staff, and to uphold the principles of neutrality, impartiality, and independence that underpin humanitarian action.*

*We believe that a balanced solution is necessary, one that respects the legitimate concerns of the Israeli authorities while preserving MSF's duty of care and legal responsibilities toward its staff."*

## **Part B – Findings and Indications Identified within the Examination of the Organization**

### **Key findings related to delegitimization of the State of Israel:**

A review of the organization's websites and additional open sources revealed publications that call for the delegitimization of the State of Israel and attribute to it grave offenses, including genocide, systematic destruction of the civilian population, mass killings, deliberate starvation, and displacement described as "ethnic cleansing". Below are selected examples of such publications identified online:

**Accordingly, below is an excerpt from an official statement by the organization. The following statements were translated from the organization's website from French to English:**

1. *"MSF France calls on the French government to take immediate measures to put an end to the **genocide** perpetrated by the Israeli authorities in Gaza... MSF denounces the **genocidal war** waged against the Palestinian population, **marked by mass killings, the systematic destruction of civilian infrastructure, a deliberate siege and famine, as well as the forced displacement of the population, described as ethnic cleansing.**"*<sup>23</sup>
2. *"Israel's response has taken the form of an almost uninterrupted **genocidal campaign** of bombardments with an intensity never before seen...are a further step in the campaign of **ethnic cleansing of Palestinians....a genocidal war waged by the Israeli army and ethnic cleansing.**"*<sup>24</sup>

### **Key findings related to calls for a boycott on the State of Israel:**

A review of the organization's websites and additional open sources revealed publications that call for the French government to impose an arms embargo on Israel and ensure that no French weapons or ammunition are used by the IDF. Additionally, links to the BDS movement were identified. Below are selected examples of such publications found online:

1. **Call for a boycott on the State of Israel on the organization's website (translated from English of the French original):**

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<sup>23</sup> See publication on the official website of Médecins Sans Frontières France (MSF-France): <https://www.msf.fr/actualites/gaza-les-medecins-ne-peuvent-pas-arreter-un-genocide-nos-dirigeants-oui>  
September 5, 2025, main page.

<sup>24</sup> See response to public questions on the MSF France website (2024): <https://www.msf.fr/gaza-nos-reponses-a-vos-questions>

*"MSF calls on France to ensure that no French weapons or ammunition are used by the Israeli army in its genocidal war in Gaza."*<sup>25</sup>

**2. Publication on the "X" network by the BDS organization, regarding the humanitarian fundraising events – "Braderie pour Gaza" in Paris (September and December 2024), with the support of MSF France:**<sup>26</sup>



<sup>25</sup> See source no. 1.

<sup>26</sup> See publication on the organization's account on the "X" network, during September and October 2024:

<https://x.com/BDSFranceParis/status/1839981049197052347>

<https://x.com/BDSFranceParis/status/1869675098216473029>

## **Key Findings - Medecins Sans Frontières Belgium**

### **Section A – General Introduction**

#### **General Background on the Organization:**

Médecins Sans Frontières Belgium (hereinafter: “MSF Belgium”), also referred to as AZG in Flemish, was established in Brussels in 1980 as part of the expansion of the humanitarian movement originating in France. The organization is registered as a non-profit association (ASBL), with its headquarters located in Brussels.

MSF Belgium operates in accordance with the principles of the international Médecins Sans Frontières movement, including the provision of urgent medical assistance to victims of conflicts, disasters, and epidemics, while maintaining strict neutrality and political independence.

The organization’s distinctiveness lies in its leadership of the Brussels Operational Centre (Operational Centre Brussels – OCB, hereinafter: “OCB”), which is one of six operational centers of Médecins Sans Frontières worldwide. OCB is responsible for managing extensive humanitarian missions across Africa, the Middle East, and Asia.

The organization’s corporate governance includes a local Board of Directors, a professional management team headed by CEO Michelle Hoffman and President Dr. Meinie Nicolai, as well as the OCB Board overseeing multinational activities.

#### **Activities and Funding**

In 2024, MSF Belgium implemented 116 medical projects across approximately 30 countries, with a primary focus on Africa (including the Democratic Republic of Congo, Chad, and South Sudan), Asia (Afghanistan and Yemen), and the Middle East (the Palestinian Authority and Syria). The organization’s activities encompassed the establishment of field hospitals, deployment of mobile clinics, provision of emergency surgical procedures, treatment of injuries resulting from gunfire and shelling, epidemic response, and the training of local medical teams. Additionally, MSF Belgium advanced psychosocial initiatives for trauma victims and conducted medical research in the fields of tuberculosis and malaria.

With regard to funding, MSF Belgium relies almost exclusively on private donations: 87% of its income is derived from contributions originating in other countries through MSF International, 12% from donations within Belgium, and only 0.3% from a government grant (Canada, 2024). The organization does not receive any funding from governments in the Middle East or from Israel. Its total budget for 2024 amounted to approximately €380.4 million, the majority of which consists of internal transfers between MSF branches.

#### **Activities in Gaza and the West Bank**

As of 2025, MSF Belgium is active in the Gaza Strip and the West Bank. Its activities include performing trauma surgeries in local hospitals, operating clinics for the treatment of gunshot wounds and mental health disorders, and providing psychological support to victims of conflict. The organization emphasizes that its operations are funded exclusively by private donations, with no reliance on regional governments.

### Status of the Organization's Application:

MSF Belgium submitted its application to the inter-ministerial team as part of the registration process, and formally applied for registration on 24 July 2025. Since then, the organization has provided most of the required information necessary for its registration. However, to date, it has not submitted the list of all employees involved in the management and implementation of the program, including Palestinian employees, with full identification details—as explicitly required by the *“Guidelines for the Registration of Organizations and Issuance of Recommendations for Their Foreign Employees.”*

In response to the inter-ministerial team's request to complete the details regarding the employee list, the organization submitted an official response letter dated 18 July 2025, stating its refusal to provide a full list of all employees. The reason given was that it has not been required to provide such information in more than 70 countries in which it operates, and therefore the organization expressed concerns regarding its responsibility in providing personal information. In particular, the organization raised concerns regarding the following aspects: the identity of entities who will have access to the information, the manner of its storage and protection, the duration of retention, and the possibility that the information will be transferred to additional entities.

### **Section B – Findings and Indicators Identified During the Organization's Review**

#### Key findings related to delegitimization of the State of Israel:

An examination of the organization's official websites and additional publicly available sources has revealed the publication of materials that advocate for the delegitimization of the State of Israel and attribute to it allegations of crimes such as genocide, systematic destruction of civilian populations, mass killings, deliberate starvation, and displacement described as “ethnic cleansing.”

Presented below are selected examples of such publications identified online:

**Accordingly, below is an excerpt from an official statement by the organization. The following statements were translated from the organization's website from the original:**

1. *“The war waged by Israel against the population of Gaza is a genocidal war, marked by mass killings, the systematic destruction of civilian infrastructure, a deliberate siege and famine, as well as the forced displacement of the population, described as ethnic cleansing.”*<sup>27</sup>
2. *“Israeli evacuation orders are a tool in a campaign of ethnic cleansing that turns Gaza into a living hell for Palestinians.”*<sup>28</sup>

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<sup>27</sup> See the organization's statement on the official MSF Belgium website: (16 June 2025):

<https://www.msf-azg.be/fr/news/lhypocrisie-des-gouvernements-europ%C3%A9ens-exacerbe-les-souffrances-%C3%A0-gaza%E2%80%AF%E2%80%AF>

<sup>28</sup> See article from the organization's website: (28 May 2025):

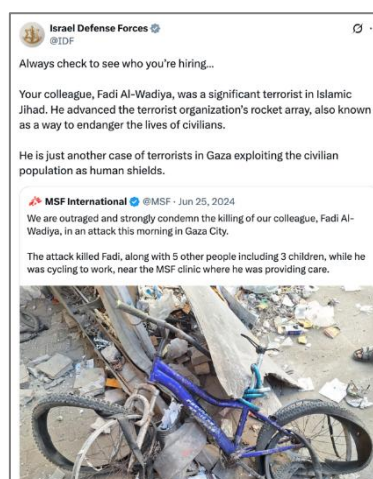
<https://www.msf-azg.be/fr/news/gaza-isra%C3%ABl-et-la-guerre-psychologique-des-d%C3%A9placements>

### Key findings related to Terrorist Entities:

A comprehensive review of the organization's official websites and additional publicly available sources has identified publications and findings indicating both direct and indirect associations between MSF Belgium and entities linked to terrorist organizations, including Islamic Jihad and the Popular Front for the Liberation of Palestine (PFLP).

Presented below are selected examples of such publications identified online:

1. **MSF employee (Fadi Al-Wadiya) in Gaza exposed as a senior terrorist operative in Islamic Jihad and an expert in rocket manufacturing<sup>29</sup>:**
- 2.



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<sup>29</sup> See Twitter post: (25 June 2024) Israel Defense Forces (@IDF) – <https://twitter.com/IDF/status/1805708917294420469>

3. Another MSF Belgium employee (Mahmoud Abunejeila)<sup>30</sup> identifies himself as a supporter of the Popular Front for the Liberation of Palestine (PFLP)<sup>31</sup>:



#### Key findings related to Denial of Israel as a Jewish and Democratic State

In reviewing the organization’s websites and other open sources, publications and articles published by the organization were identified that present a consistent anti-Israeli narrative, including claims that Israel is not democratic for Palestinians.

Outlined below are selected examples of such publications identified online:

Attached below are selected quotations from the organization’s report entitled “Inflicting Harm and Denying Care,” as published and presented in 2025: <sup>32</sup>

- “*This increased wave of violence takes place in a **context of oppression** Palestinians endure under Israeli occupation, which recently the International Court of Justice (ICJ), on 19 July 2024, deemed unlawful and in clear violation of international prohibitions against **racial segregation and apartheid**.*”<sup>33</sup>

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<sup>30</sup> See official organization report on the death of Abu Nujeila (21 October 2023):

[MSF doctors killed in strike on Al-Awda hospital in northern Gaza | Palestine | MSF](#)

<sup>31</sup> See official post by Abu Nujeila:

[Mahmoud Abunejeila | Facebook](#)

<sup>32</sup> See report published on the organization’s website (the link contains the report): (6 February 2025):

<https://press.msf-azg.be/cisjordanie-un-rapport-de-msf-documente-lescalade-des-attaques-israeliennes-et-entraves-aux-soins-contre-les-structures-medicales-et-les-soignants>

<sup>33</sup> See: MSF Report, p. 6

- *“Impediments to Palestinian access to healthcare by Israeli forces are part of a wider system of collective punishment imposed by Israel, **under the guise of its crackdown on armed Palestinian men.**”<sup>34</sup>*
- *“This surge in violence is not an isolated event, but part of a long history of **systemic oppression and colonization by Israel.**”<sup>35</sup>*
- *“The Israeli authorities have imposed a system that discriminates against Palestinians, restricts their movement, and denies them basic rights, including access to healthcare.”<sup>36</sup>*
- *“Israel, as the occupying power, is failing to fulfil its legal obligations under both International Humanitarian Law – which applies in situations of military occupation – **and human rights law, which upholds the right to life and prohibits the excessive and disproportionate use of force.**”<sup>37</sup>*
- *“We are being **collectively punished**, as is the rest of the West Bank. In fact, whenever something happens elsewhere in the West Bank, we always need to expect retaliation by settlers or Israeli forces.”<sup>38</sup>*

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<sup>34</sup> See: MSF Report, p. 6

<sup>35</sup> See: MSF Report, p. 7

<sup>36</sup> See: MSF Report, p. 7

<sup>37</sup> See: MSF Report, p. 8

<sup>38</sup> See: MSF Report, p. 37

## **Key Findings -Artsen zonder Grenzen (Medecins Sans Frontieres Nederland)**

### **Section A – General Introduction**

#### **General Background on the Organization:**

Artsen zonder Grenzen – MSF Netherlands (hereinafter: "MSF Netherlands"), was founded in Amsterdam on September 7, 1984, by a group of doctors who had returned from missions with MSF Belgium, becoming the fourth branch in the international movement. Today, it serves as a leading operational center, OCA – Operational Centre Amsterdam (hereinafter: "OCA"), managing operations in approximately 25–30 countries annually. The organization adheres to the principles of neutrality, impartiality, and independence, and emphasizes the principle of "témoignage"—bearing witness to the suffering of crisis victims. Over the years, it has led major relief operations, from Rwanda to Haiti, and in 1999 was part of MSF's Nobel Peace Prize win. Its headquarters are in Amsterdam, and it is registered as an association with approximately 790 members (as of the end of 2024).

MSF Netherlands is managed as an association with a Board of Directors comprising 10 elected and volunteer members, alongside a professional management team headed by CEO Vicki Hawkins (since 2023). The management includes an Operations Director, Medical Director, Chief Financial Officer, and Human Resources Director, and oversees approximately 3,000 employees worldwide. The board sets strategy, approves budgets, and supervises risk management, maintaining separation of powers and internal controls.

#### **Activities and Funding**

In 2024, the organization allocated approximately 310.3€ million to emergency medical operations, mainly in Sudan, Afghanistan, Ethiopia, and Yemen. It operates field hospitals, nutrition centers, trauma units, and large-scale vaccination campaigns, and leads medical innovation such as the use of the R21 malaria vaccine and the PRACTECAL trial for drug-resistant tuberculosis. The organization funds its activities almost entirely from private donations: in 2024, it raised about €79.7 million in the Netherlands, with 99.6% of income from private sources. Governmental contributions were negligible (about 2€ million, 0.4% of the budget), with no connection to activities in Israel or the territories. Salary policy is modest: the CEO's salary is estimated at €8,000–€9,000 gross per month, and general management accounts for only 2.7% of the budget.

#### **Activities in Gaza and the West Bank**

As of 2025, MSF Netherlands operates in the Gaza Strip and the West Bank through its OCA missions, delivering emergency medical treatment, performing urgent surgical procedures, and offering psychological support to those affected by conflict. The organization underscores that all funding for these activities is sourced solely from private donations, with no financial support from governmental bodies or the Palestinian Authority, in strict adherence to its commitment to independence and neutrality.

#### **Status of the Organization's Application:**

MSF Netherlands submitted its application to the inter-ministerial team as part of the registration process, and formally applied for registration on 2 July 2025. Since then, the organization has provided most of the required information necessary for its registration.

However, it has not yet provided the list of Palestinian employees involved in the management and implementation of the program, including ID numbers and contact details — as explicitly required by the “*Guidelines for the Registration of Organizations and Issuance of Recommendations for Their Foreign Employees.*”

In response to the inter-ministerial team’s request to complete the details regarding the employee list, the organization submitted an official response letter dated 24 July 2025, stating its refusal to provide a full list of all employees. The reason given was that it has not been required to provide such information in more than 70 countries in which it operates, and therefore the organization expressed concerns regarding its responsibility in providing personal information. In particular, the organization raised concerns regarding the following aspects: the identity of entities who will have access to the information, the manner of its storage and protection, the duration of retention, and the possibility that the information will be transferred to additional entities.

## **Section B – Findings and Indicators Identified During the Organization’s Review**

### **Key findings related to delegitimization of the State of Israel:**

An examination of the organization’s official websites and additional publicly available sources has revealed the publication of materials that advocate for the delegitimization of the State of Israel and attribute to it allegations of crimes such as genocide, systematic destruction of civilian populations and deliberate starvation.

Presented below are selected examples of such publications identified online:

**Accordingly, below is an excerpt from an official statement by the organization. The following statements were translated to English from the organization’s website from Dutch:**

1. ***“Stop the genocide.... For almost two years, we have witnessed the destruction of healthcare facilities, the silencing of journalists, and aid workers buried under the rubble. While Israel continues to ignore international law, **the only witnesses to their genocidal campaign are deliberately targeted.** This must stop now.”***<sup>39</sup>
2. ***“What is happening in Gaza is not just a humanitarian disaster. **It is the systematic extermination of a people.**”***<sup>40</sup>
3. ***“More than 500 people have now been killed at these distribution points... **This “aid” is soaked in blood...**”***<sup>41</sup>
4. In its December 2024 report “Gaza: Life in a Death Trap,” the organization presents data on thousands of trauma victims, **claiming that 81% were directly injured by bombings, without distinguishing between combatants and civilians.** The report ignores the context of fighting, including Hamas’ use of

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<sup>39</sup> See publication from the official website of MSF Netherlands dated 18 September 2025 : [Zeven beelden van fotojournalist Mariam uit Gaza](#)

<sup>40</sup> See Source No. 1

<sup>41</sup> See publication from the official website of MSF Netherlands dated 11 July 2025: [Gaza: humanitaire hulp aangevallen en afgeknepen - Artsen zonder Grenzen](#)

hospitals as command centers, firing from medical facilities, and hiding hostages in medical institutions<sup>42</sup>.

### Rapport: 'Gaza: Life in a death trap'

Donderdag 19 December 2024

Artsen zonder Grenzen publiceert een uitgebreid en krachtig rapport over de humanitaire crisis in Gaza. In het rapport 'Gaza: Life in a death trap', zijn de voortdurende verwoesting door Israëlische aanvallen, blokkades en de systematische vernietiging van de levensomstandigheden van Palestijnen gedocumenteerd. We roepen op tot een onmiddellijke wapenstilstand en dringende toegang voor humanitaire hulp om het leed van de bevolking te verlichten. Daarom lees je hier ook de open brief die we naar minister Veldkamp hebben gestuurd.



### Key findings related to calls for a boycott on the State of Israel:

A review of the organization's websites and additional open sources revealed publications that the organization has explicitly called on the Dutch government to halt arms supplies to Israel, consider economic sanctions, and suspend investments in Israel. Furthermore, Artsen zonder Grenzen (AZG) is part of the international MSF network, which has called for the advancement of political and economic sanctions against Israel. The organization also sent an official letter to the Dutch Foreign Minister, demanding the suspension of economic, commercial, and political agreements between the European Union and Israel, effectively supporting a boycott of Israel. Below are selected examples of such publications found online:

1. *" We call on the Dutch government to **stop supplying arms and military equipment to Israel.** "*
2. *"The Dutch government should **urge the European Union to suspend the Association Agreement with Israel.**"<sup>43</sup> "*
3. *"We urge the Dutch government to **consider economic sanctions and to suspend investments in Israel.**"*

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<sup>42</sup> [Rapport: 'Gaza: Life in a death trap' - Artsen zonder Grenzen](#)

<sup>43</sup> [Microsoft Word - Brief minister Veldkamp Noord-Gaza DEF](#)

## **Key Findings -Médicos Sin Fronteras Spain**

### **Section A – General Introduction**

#### **General Background on the Organization:**

Médicos Sin Fronteras Spain – MSF Spain (hereinafter: "MSF Spain") was founded in 1986 in Barcelona and is one of the principal operational centers of the international network—OCBA- Operational Centre Barcelona-Athens, (hereinafter: "OCBA"). The organization began as a small group of volunteers but expanded significantly during the 1990s, becoming a cornerstone of MSF's global humanitarian activities. Today, MSF Spain leads the Barcelona-Athens operational center, which also includes the Greek branch and additional partners, and manages projects in over 25 countries, with a focus on Spanish- and English-speaking regions. The organization has been registered as an independent Spanish association since 1986 and is governed by a Board of Directors and a professional management team. Its headquarters are located in Barcelona, with a management branch in the UK for OCBA and a field office in East Jerusalem. The number of association members has grown in recent decades, and currently there are over 500 voting members in the general assembly.

#### **Activities and Funding**

The organization primarily funds its activities through private donations—in 2024, 99% of its income came from private sources, out of a total budget of €279 million. Public (governmental) funding was minimal, only about 1%, mainly from grants provided by UN agencies and international funds. MSF Spain reports that it did not receive any government donations for its activities in Israel or the territories, and that activities there are funded exclusively by private sources. The organization is committed to independence from governments, and in recent years has even refused funding from the European Union and its member states due to policy disagreements.

#### **Activities in Gaza and the West Bank**

MSF Spain is particularly active in Latin America, Africa, the Mediterranean region, and the Middle East. In Israel and the territories, the organization operates a delegation in Jerusalem, psychosocial clinics in the West Bank, and rehabilitation treatments in Gaza. In 2024, approximately 30,000 medical encounters were conducted and nearly 2,000 surgeries performed in the Palestinian territories. The organization operates in accordance with the principles of neutrality, independence, and non-discrimination, and strictly adheres to Spanish regulations and the global MSF code of ethics.

#### **Status of the Organization's Application:**

MSF Spain submitted its application to the Inter-Ministerial team as part of the registration process, and formally applied for registration on 30 June 2025. Since then, the organization has provided most of the required information necessary for its registration. However, it has not yet provided the list of Palestinian employees involved in the management and implementation of the program, including ID numbers and contact details — as explicitly required by the *"Guidelines for the Registration of Organizations and Issuance of Recommendations for Their Foreign Employees."*

In response to the inter-ministerial team's request to complete the details regarding the employee list, the organization submitted an official response letter dated 24 July 2025, stating its refusal to provide a full list of all employees. The reason given was that it has

not been required to provide such information in more than 70 countries in which it operates, and therefore the organization expressed concerns regarding its responsibility in providing personal information. In particular, the organization raised concerns regarding the following aspects: the identification of the entities who will be granted access to the information; the methods employed for its storage and safeguarding; the period for which the information will be retained, and the potential for its transfer to additional entities.

## **Section B – Findings and Indicators Identified During the Organization’s Review**

### **Key findings related to delegitimization of the State of Israel:**

An examination of the organization’s official websites and additional publicly available sources has revealed the publication of materials that advocate for the delegitimization of the State of Israel and attribute to it allegations of crimes such as genocide, systematic destruction of civilian populations, deliberate starvation, and militarization and politicization of humanitarian aid.

Presented below are selected examples of such publications identified online:

**Accordingly, below is an excerpt from an official statement by the organization. The following statements were translated from the organization’s website from Spanish:**

1. *“Israel’s **genocidal campaign** in Gaza has destroyed most of the means of livelihood for Palestinians in the Strip, and Israeli authorities **continue to deny the population its most basic needs for survival**. The **genocide in Gaza** has been carried out not only through killings, detentions, and direct attacks, but also through the **systematic destruction of infrastructure and the denial of means of survival**: food, water, shelter, healthcare, fuel, and livelihoods....Gaza is in ruins. The impact of such **devastation and destruction of public and private infrastructure, including the health system**, will require a titanic task of reconstruction and recovery. Israeli forces have **systematically attacked Gaza’s health system**, bombing hospitals, raiding medical facilities, and endangering the lives of staff and patients, accompanied by the persecution of medical personnel.”*<sup>44</sup>
2. *“The situation in the Strip has worsened even further after the blockade of humanitarian aid since last March 2. The Government of Israel has monopolized aid **“with a model that, far from alleviating suffering, perpetuates it,”** according to the statement read during the event. “It fragments, conditions, and politicizes assistance, violating the fundamental principles of neutrality, impartiality, and independence. **This is not a humanitarian aid system, it is the militarization of aid against a starving population.**”*<sup>45</sup>

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<sup>44</sup> See publication on the official MSF Spain website dated December 8, 2025:

[Genocidio en Gaza | Médicos Sin Fronteras](#)

<sup>45</sup> See publication on the official MSF Spain website dated June 27, 2025:

[Gaza: Seis ONG denuncian el sufrimiento extremo de la población | MSF](#)

3. *"Malnutrition in Gaza is the result of deliberate and calculated decisions by the Israeli authorities: restricting the entry of food to the bare minimum for survival, and dictating and **militarizing the means of distribution. All this while most of the local food production capacity is being destroyed.**"*<sup>46</sup>

Key findings related to calls for a boycott on the State of Israel:

A review of the organization's websites and other available sources identified publications urging the European Union and its twenty-seven member states to take decisive action, and exercise their influence over Israel in order to bring end the killings, and cease the supply of weapons utilized against civilians.

Presented below are selected examples of such publications identified online:

**Accordingly, below is an excerpt from an official statement by the organization. The following statements were translated from the organization's website from Spanish:**

*"The EU and many of its leaders have recently chosen to reprimand Israel; however, these words ring hollow, as they do not take the substantial measures necessary to stop the killing, and hypocritically continue to provide weapons to Israel that kill, burn, or permanently disable the people who end up in our hospitals. This must end.*

*There was never time for hesitation and inhuman double standards. **Your words and actions test your credibility and leadership.** We are facing a moment that will define your legacy and determine whether the laws intended to protect civilians in war retain any meaning. It requires political courage, legal responsibility, and moral commitment. The magnitude of suffering in Gaza demands more than your empty rhetoric.*

***Every delay, every hesitation, and every policy that allows the machinery of devastation to advance with impunity is an act of complicity.***

***We urge the European Union and its 27 member states to act decisively and finally use the influence they have over Israel"***<sup>47</sup>

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<sup>46</sup> See the publication on the official MSF Spain website dated 18 July 2025:

[La desnutrición alcanza un máximo histórico en dos instalaciones de MSF en Gaza](#)

<sup>47</sup> See publication on the official MSF Spain website dated 16 June 2025:

[Carta abierta a jefes de Estado UE presidentes Instituciones UE | MSF](#)