

NGO Monitor Submission to the Committee on the Elimination of Discrimination Against Women Review of Israel

Introduction

NGO Monitor presents this submission to the UN Committee on the Elimination of Discrimination against Women ("CEDAW" or "Committee") in advance of Israel's combined Fourth and Fifth periodic reports (CEDAW/C/ISR/4) on January 18, 2010.

Israel is a vibrant parliamentary democracy facing many challenges, including the need to defend its citizens against terror attacks from Hamas-controlled Gaza, the West Bank, and Hezbollah-controlled Southern Lebanon. The civil society (NGO) network thrives in Israel and often provides valuable humanitarian assistance, including health services, education, and other basic requirements under many different and complex conditions.

Unfortunately, however, this network also often plays a counterproductive role in the context of efforts to resolve the Arab-Israeli conflict. As NGO Monitor and others have documented, some NGOs produce reports and launch campaigns that stand in sharp contradiction to their stated mandates of upholding universal human rights.

These NGO activities regularly obscure or remove the context of terrorism, provide false or incomplete statistics and images, and disseminate gross distortions of the humanitarian, human rights, and international legal dimensions of the Arab-Israeli conflict. This activity often stresses the rights of Palestinians at the expense of Israelis, and promotes the protection of some rights – such as the "right to enjoy one's culture" – at the expense of more fundamental rights – such as the right to life or the right to self-defense.

Moreover, violations of human rights and international humanitarian law committed by Palestinian actors or terror groups, such as Hezbollah, are systematically ignored or minimized. As a result, NGO publications and campaigns, including submissions to the United Nations, provide an incomplete and often non-credible picture.

The following analysis and examples highlight the problems of the joint NGO submission (and supplement) to the Committee body. The joint NGO submission

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¹ Alternative Report for Consideration Regarding Israel's Fifth Periodic Report to the United Nations Committee on the Elimination of Discrimination Against Women 17 January – 4 February 2011 (Prepared by WCLAC), *available at*

http://www2.ohchr.org/english/bodies/cedaw/docs/ngos/WCLAC_for_the_session_ISRAEL_CEDAW48.pdf [hereinafter "Joint Submission"]; Supplement to the Alternative Report Submitted by the Women's Center for Legal Aid and Counseling (WCLAC) Submitted to the Committee for the Elimination of Discrimination Against Women, available at



grossly distorts the humanitarian, human rights, and international legal dimensions of the Arab-Israeli conflict by:

- focusing almost exclusively on alleged violations of Palestinian human rights;
- falsely manipulating a political and territorial dispute, marked by asymmetrical warfare, into one of racial, ethnic, and religious, and gender discrimination;
- omitting the context of terrorism.
- failing to provide sources for claims, allegations based on questionable statistics, and repetition of and citation to claims by non-credible NGOs all in violation of best practices;
- ignoring cultural and other factors, placing sole blame on Israel for Palestinian complaints;
- ignoring areas where Israel has promoted the status of women, including taking proactive steps to advance the status of women in Bedouin communities and creating a National Domestic Violence Investigative System.²

In contrast, other NGO submissions, such as that by the Global Initiative to End All Corporal Punishment of Children and the International Disability Alliance Israel raise genuine criticisms of Israel's human rights record without the accompanying rhetoric and demonization contained in the statements analyzed below.

Joint NGO Submission

The Women's Centre for Legal Aid and Counseling (WCLAC), Addameer Prisoner Support and Human Rights Association, <u>Al Haq</u>, <u>Badil</u>, <u>The Centre on Housing Rights and Eviction (COHRE)</u>, <u>Defence for Children International – Palestine, Palestinian Centre for Human Rights (PCHR)</u>, Palestinian Working Women's Society for Development, Women's Affairs Technical Committee, and Women's Study Centre submitted a joint statement to the Committee. In addition, Badil prepared a supplement to the original submission.

Methodological Flaws

The joint NGO submission and the Badil supplement are characterized by the following methodological flaws:

http://www2.ohchr.org/english/bodies/cedaw/docs/ngos/BADIL_Resource_Center_for_Palestinian_Residency_Israel_CEDAW48.pdf [hereinafter "Supplement".]

 $a.m., \underline{http://domino.un.org/unispal.nsf/361eea1cc08301c485256cf600606959/417806fbe6ee04b88525726}{70052b037? \underline{OpenDocument}}$

² Committee on the Elimination of Discrimination against Women Thirty-third session Summary record of the 685th meeting Held at Headquarters, New York, on Wednesday, 6 July 2005, at 10



- Drawing broad conclusions based solely on a few emotional anecdotes and non-representative samples. The WCLAC and Badil submissions overwhelmingly rely on anecdotal claims provided by other NGOs. For instance, Badil's allegation of Israeli discriminatory housing policy against women simply quotes an unverifiable story from a Palestinian Center for Human Rights publication. Little, if any independent data is provided to back their claims.
- No evidence of gender discrimination is provided. The joint NGO submission and the Badil supplement offer no evidence of gender discrimination other than generalized statements that "occupation" has a greater impact on women. All States must take into account competing rights when implementing social and security policies. They have the difficult task of balancing various rights while maintaining safety and security. No evidence is offered demonstrating Israeli-enacted legislation mandating women "inequitable access to health, education, services, and socioeconomic and political parity."³
- Contradictory claims. The submissions blame Israel for disparities in Palestinian women's health in the West Bank. Yet, Badil admits that infant mortality in the West Bank has dropped significantly since 1967 and is much lower than in Syria, Lebanon, and Gaza where there is no Israeli presence.⁴ Elsewhere, Badil acknowledges that "Palestinian refugee women, including those in camps, have positive health indicators including access to health centers during pregnancy and qualified birth assistance."⁵
- Omission of cultural factors and the context of terrorism. The submissions attribute a host of ills, including domestic violence, miscarriages, and unemployment, to Israeli military operations. Yet, the submissions ignore factors attributable to Palestinian society such as cultural norms, religious coercion, Palestinian corruption, and the context of terrorism.
- **Distortion of international law**. The submission makes generalized claims such as "in blatant violation of its obligations under international humanitarian and human rights law, Israel as the occupying power has, without military necessity, expropriated privately owned Palestinian land with the aim of constructing permanent infrastructure." Yet, Badil offers no specific legal obligations owed by Israel, no proof of "private Palestinian" ownership, nor any analysis for its accusations of lack of "military necessity." The submissions invent several rights imputing non-existent legal obligations to Israel.
- Use of gratuitous and inflammatory rhetoric. These submissions include gratuitous and inflammatory rhetoric, which are not aimed at providing constructive criticism to improve Israel's compliance with CEDAW, but rather, are simply used to demonize Israel and to advance the political agenda of these organizations. For example, the WCLAC submission refers to the

⁴ Supplement at para. 3.1

³ Supplement at para. 2.4.

⁵ Supplement at para. 3.2.

⁶ Supplement at para. 2.3.



"discriminatory municipal planning system". Badil's supplement refers to "forced population transfers" and a "discriminatory regime comprised of colonization, apartheid and occupation." This language is simply inflammatory rhetoric without substance.

• Falsely ascribing discriminatory intent to anti-terror legislation. The WCLAC submission charges that Israel "routinely, through practice and policy, [is] denying many thousands of Palestinian women the opportunity to enjoy their rights as citizens or nationals and their fundamental right to enjoy their private and family life by living together," and specifically refers to the Citizenship and Entry into Israel Law. Notably, however, these organizations omit that this law was not enacted for discriminatory purposes but rather, because of persons "who were granted legal status in Israel based on their marriage to an Israeli citizen, and took advantage of their Israeli ID to pass checkpoints and carry into Israel either suicide bombers or explosives." Twenty-three terrorist attacks resulted from an abuse of this law. Almost all countries have residency laws pertaining to noncitizens and that several countries do not grant automatic citizenship or residency rights as a result of marriage. These NGOs also fail to inform that this law is temporary and can be repealed should the security situation in Israel improve.

NGOs Misrepresent Women's Reality in the Palestinian Authority

The WCLAC and Badil submissions ignore the primary causes of women's discrimination and suffering in the Palestinian Authority, as these factors do not support their agenda of Palestinian victimization and Israeli demonization:

• Human rights advocates and international monitors have frequently cited the deterioration of women's rights in the Gaza Strip as a result of the 2007 coup by the Hamas terror organization. The report does not address new restrictions imposed by Hamas, severely restricting women's freedom of expression and freedom of movement. As a result, women's groups in the Gaza Strip have been prevented from implementing programs and instead have been forced in providing emergency services.

In addition, Hamas has amended the Personal Status Law and of the Penal Code imposing a strict and discriminatory version of Shari'a. Among other repressive

⁸ Submission of the Israeli Government to the UN Committee on the Elimination of Racial Discrimination, UN Document CERD/C/471/Add.2, available at http://www2.ohchr.org/english/bodies/cerd/cerds70.htm.

⁹ *Id.*

⁷ Joint submission at para. 5.1.

¹⁰ Euromed Gender Report: National Situation Analysis Report: Women's Human Rights and Gender Equality (2009-2010), Euromed Gender Equality Program, 19, *available at* http://www.euromedgenderequality.org/image/file/Analyse%20de%20la%20situation/Situation%20Analysis Report_OPT.pdf [hereinafter "Euromed Gender Report"]

¹¹ *Id.*



laws, women are not allowed to walk on the beach alone or smoke in public. Female lawyers must appear with hijab in court. 12

Hamas actively works to prevent development within the Gaza Strip. In February 2009, UN aid was halted after Hamas seized thousands of tons of food and provisions. ¹³ In May 2010, Hamas was suspected of burning down a children's recreation facility in Gaza City. ¹⁴ Hamas repeatedly attacks Israeli border crossings impeding the flow of goods into Gaza. There have been several attacks at the Kerem Shalom crossing where humanitarian aid to the Gaza Strip is transferred. In January 2010, the crossing was closed after mortar shells were fired at the crossing. In 2008, three gunmen attempted to infiltrate Israel through the crossing. 15

- The NGOs attribute discrepancies in girls' education to "settler violence." Yet, they ignore factors such as an overwhelmingly patriarchal society and that many girls are forced to withdraw from secondary schools because of early marriage. ¹⁶
- The NGO submissions are silent on "honor killings" which have increased in recent years and are treated with impunity in the Palestinian Authority and Gaza.¹⁷ According to a UNICEF report, two-thirds of all murders in the Palestinian Authority and Gaza are "honor killings." Between 2004 and 2006, 32 murders of women committed by family members were documented, but it is acknowledged that many more have occurred without reporting. ¹⁹ Current laws in the Palestinian Authority and Gaza grant impunity to murderers when they are committed on the grounds of "family honor." Some authors of the report, including WCLAC and PCHR, have decried "honor killings" and the lack of legal protection for women in media reports, yet they are glaringly silent when given a forum to address these issues to the CEDAW committee.

¹² Gaza's Women: Who is Defending Their Rights, Khaled Abu Toameh, (Nov 23, 2010) available at http://www.hudson-ny.org/1677/gaza-women-rights.

13 UN halts aid into Gaza after 'Hamas theft,' THE GUARDIAN, Feb. 6, 2009, available at

http://www.guardian.co.uk/world/2009/feb/06/gaza-un-aid-hamas.

¹⁴ Hamas makes arrests after UNRWA arson, Ma'AN NEWS AGENCY, May 25, 2010, http://www.maannews.net/eng/ViewDetails.aspx?ID=287115

¹⁵ HRW's Letter to President Bush on Gaza: The "Collective Punishment" Hoax, NGO Monitor, June 16, 2008, available at http://www.ngo-

monitor.org/article/hrw s letter to president bush on gaza the collective punishment hoax.

¹⁶ According to the Euromed Gender Equality Report, 4.8% of girls withdrew from secondary schools in 2004 due to early marriage (32.2% of women are married before age 18; 50% were younger than 19 when their first child was born).

¹⁷ Euromed Gender Report at 34.

¹⁸ UNICEF Newsline, March 7, 2000, http://www.unicef.org/newsline/00pr17.htm

¹⁹ Euromed Gender Report at 34.

²¹ See generally, "Police: Man killed aunt for reasons of family honor," Ma'an News Agnecy, (May 18, 2009), available at http://www.maannews.net/eng/ViewDetails.aspx?ID=210620;"I'd do it again, says honor killer," Anne Barker, ABC News (Sep 20, 2010), available at http://www.abc.net.au/news/stories/2010/09/20/3016288.htm; "Rights groups decry Gaza killing," CNN



- The NGO submissions make no mention of the widespread social problems associated with polygamy in Palestinian society and the "unbearable" effects the epidemic has on women and children. According to studies by Professor Elian al-Karinawi, head of the Social Work Department at Ben-Gurion University, children in polygamous families often suffer more psychological problems than those in monogamous households, and the dominant manifestations of such problems include higher rates of criminal activity and dropouts.²²
- The report fails to mention the high index of violence against women in the Palestinian Authority and Gaza.²³ A 2005 survey showed that over 60 percent of women were psychologically abused by their husband, 23 percent had been beaten and 11 percent experienced some form of sexual violence.²⁴ Within this context, rapists are granted immunity if they marry their victims and marital rape is not criminally recognized under Palestinian Authority or Hamas laws. Only male relatives can file charges of sexual abuse.²⁵ Female genital mutilation is still practiced in the Gaza Strip.²⁶
- The authors are silent regarding the phenomenon of rapes and sexual assaults of foreign activists working in the Palestinian Authority. According to news reports, after a female activist complained of rape, leaders of the Palestinian popular protests in Bil'in, Na'alim, and Umm Salmuna tried to "keep [the] story away from both public knowledge and the media's eye."²⁷ Furthermore, the victim of the attempted rape was pressured by both the Palestinian popular protest movement and the PA to withdraw her complaint, and prevented her from making her story public.²⁸ Eventually, she succumbed to this political pressure and retracted her complaint. Her story is not unique; according to news reports, female activists have often been molested and sexually assaulted in villages bordering the security barrier. These so-called human rights groups silenced sexual assault victims to further their political agenda.

News, (July 30, 2009), available at http://articles.cnn.com/2009-07-

30/world/mideast.honor.killings_1_honor-killings-gaza-human-rights?_s=PM:WORLD; "Killed for being pregnant with a baby girl," Fox News, (May 13, 2010), available at

http://www.foxnews.com/opinion/2010/05/13/phyllis-chesler-palestinian-husband-wife-ultrasound-girl-

honor-killing/
²² Ruth Sinai, "State program to tackle problem of polygamy in Bedouin community," HaAretz, March 27, 2008, available at http://www.haaretz.com/print-edition/news/state-program-to-tackle-problem-ofpolygamy-in-bedouin-community-1.242837.

²³ Freedom House Report on "Israel-Occupied Territories (2010)" *available at*

http://www.freedomhouse.org/template.cfm?page=22&year=2010&country=7963.

Euromed Gender Equality Report at 7.

²⁵ Euromed Gender Equality Report at 18.

²⁶ Euromed Gender Equality Report at 7.

²⁷ NGO Monitor Digest report http://www.ngo-monitor.org/digest info.php?id=2968#rape

²⁸ HaAretz article http://www.haaretz.com/blogs/mess-report/mess-report-are-the-palestinians-silencing- the-attempted-rape-of-u-s-peace-activist-1.301905



• Women are not strongly represented in governing bodies in the Palestinian Authority. As of June 2009, only five of twenty-three ministers were women and only 15% of senior government positions were occupied by women. Only 9% of the judiciary is female.²⁹

The NGOs' failure to mention *any* of these critical issues highlights that political objectives, rather than women's rights, was the primary goal of their submissions to the Committee.

Applicability of CEDAW to non-Israeli Citizens in the Palestinian Authority

The joint NGO submission claims to: "bring certain specific issues relating to violations of the Convention on the Elimination of Discrimination Against Women (CEDAW) by the State Party affecting Palestinian women in the Occupied Palestinian Territory to the attention of the Committee on the Elimination of Discrimination against Women (the Committee)."

Under international law, human rights treaties are only applicable to territory (and possibly to citizens outside the territory) under the State party's jurisdiction. As a result, CEDAW has no applicability to Gaza following the 2005 Israeli withdrawal. It is also unclear whether CEDAW (and other human rights treaties) are applicable in areas governed by international humanitarian law as that law is the *lex specialis*. Therefore, the law is not settled as to whether Israel's obligations under CEDAW are applicable to non-Israeli citizens located elsewhere in the Palestinian Authority. Pursuant to the Oslo Accords, the Palestinian Authority is charged with responsibilities over health, education and employment for non-Israeli citizens. Israeli legislation relating to those issues is not binding on those individuals and within those areas.

NGO Bias

Although these NGOs claim to promote human rights and humanitarian goals, their work lacks credibility and, in some cases, involves the promotion of inflammatory and antisemitic rhethoric. In addition, they do little or no campaigning aimed at preventing Palestinian attacks on women and children:

Al Haq This Ramallah-based organization routinely ignores Palestinian attacks on civilians, including those perpetrated against women and children. On occasion, it goes so far as to claim they are legal acts of "resistance." For instance, Shawan Jabarin, Al Haq's General Director, complained that after 9/11, "the United States succeeded in establishing linkages between legitimate resistance against occupation and terrorism." Al-Haq's former General Director, Randa Siniora also stated, "Although resistance against occupation and its arbitrary practices is legitimate under international law, and these acts are considered a part of the Palestinian people's resistance and struggle

²⁹ Euromed Gender Report at 21.



against occupation in order to achieve their right to liberation and independence, the occupation forces call it 'terrorism' or 'destructive acts.'"³⁰

Notably, Jabarin has been linked to the Popular Front for the Liberation of Palestine terror organization. In 1985, Jabarin was convicted for recruiting members on behalf of the PFLP. Jabarin was also found guilty of arranging PFLP training outside Israel, and was sentenced by Israeli courts to twenty-four months imprisonment, of which he served nine. In 1994, he again was arrested for continued involvement with the PFLP. For similar reasons, Jordan denied Jabarin entry in 2003. The Israeli High Court of Justice (HCJ) noted that Jabarin "is among the senior activists of the terrorist organization, The Popular Front for the Liberation of Palestine." The Court also stated that

[Jabarin] is apparently active as a Dr. Jekyll and Mr. Hyde, in part of his hours of activity he is the director of a human rights organization, and in another part he is an activist in a terrorist organization which does not shy away from acts of murder and attempted murder, which have nothing to do with rights, and, on the contrary, deny the most basic right of all, the most fundamental of fundamental rights, without which there are no other rights – the right to life.

A 2009 decision by the HCJ found that "material pointing to [Jabarin's] involvement in the activity of terrorist entities is concrete and reliable."³¹

Al Haq has launched a campaign to attack and disable the Israeli justice system. A recent publication issued by Al Haq suggested that political activists "flood[] the [Israeli High] Court with petitions in the hope of obstructing its functioning and resources."³²

Al Haq is also a supporter of boycotts, divestment, and sanctions (BDS) against Israel. Ironically, although the group accuses Israel of "collective punishment" for its economic policies towards Gaza, the organization does not explain how its promotion of BDS does not advocate for "collective punishment" against Israeli civilians.

Badil is one of the most active NGOs in promoting a rejectionist Palestinian political position in the conflict against Israel. Its declared goal is to "provide a resource pool of alternative, critical and progressive information and analysis on the question of Palestinian refugees and displaced persons." Its actions, in contrast, focus on the use of the suffering of refugees as a political basis for maintaining the conflict with Israel. The

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³⁰ Randa Siniora, "Legal cover for illegitimate practices," (Apr. 28, 2003), *available at* http://www.alhaq.org/etemplate.php?id=47.

³¹ Jabarin v. The Commander of the IDF Forces in the West Bank, HCJ 1520/09, unofficial translation available at http://www.alhaq.org/pdfs/Shawan-abarin-v.pdf.

³² See "Legitimising the Illegitimate? The Israeli High Court of Justice and the Occupied Palestinian Territory", (Nov. 25, 2010) available at http://www.alhaq.org/etemplate.php?id=558



group campaigns against recognition of Israel as a Jewish state, openly declaring the goal of using the "right of return" to "alter the demographic balance in Israel so much that it would destroy Israel's Zionist, exclusionist character..."

The organization often promotes antisemitic imagery and themes in its campaigning. A 2010 monetary award winner of its annual "Nakba Commemoration" poster contest shows a grotesque caricature of a Jewish man, garbed in traditional Hasidic attire with a menacing grin, hooked nose, and sidelocks. Surrounded by skulls, he stands on a platform dated "1948" crushing to death an Arab woman and child. He holds a pitchfork dripping with blood. Although the image was removed from the website after NGO Monitor alerted one of Badil's funders, several antisemitic images remain, including a monstrous octopus identified with a Star of David on its head, its tentacles dripping with blood. The image of the "octopus" recalls the most virulent antisemitic imagery from the Nazi era.

In addition to its poster contest, Badil is often involved in inflammatory activities that fuel the conflict. In 2007, Badil launched "A Call to Action to mark 60 years of Nakba." The campaign called upon "global civil society" to take part in "BDS, legal actions, media work, and public education and publicity campaigns." One program sought to enlist journalists "to organize a targeted campaign to expose the lies of AIPAC and the Anti-Defamation League and to expose the Jewish and Zionist community's double standards regarding Nakba & Occupation." ³³

Center on Housing Rights and Evictions (COHRE) is a Netherlands-registered NGO based in Switzerland. This group calls for the right of return of Palestinian refugees and accuses Israel of "ethnic cleansing," "collective punishment," and other inflammatory charges. In contrast to some activities that are consistent with its mandate, in the Middle East, COHRE has worked together with BADIL (described above). In May 2005 joint publication, for example, COHRE and BADIL accused Israel of "the calculated theft of Palestinian land...through military aggression...the imposition of apartheid-like laws...a cruel form of ethnic cleansing."

<u>DCI-Palestine</u> is a highly politicized group which exploits the rhetoric of human rights to demonize Israel. They most recently accused Israeli soldiers of sexual assault of children.³⁴

On April 14, 2010, Defence for Children International – Palestine Section (DCI-PS) published a list alleging that 352 children died "as a direct result of Israel's military offensive." These figures were highly exaggerated. Several of the individuals on

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³³ See e.g. "40/60 Call to Action," available at http://www.badil.org/en/al-majdal/item/417-40/60-call-to-action

³⁴ DCI-Palestine submits 14 cases of sexual assault and threats to the UN for investigation, DCI-Palestine, May 18, 2010, *available at* http://www.dci-pal.org/english/display.cfm?DocId=1476&CategoryId=1.

³⁵ "Operation Cast Lead: 352 children killed," Apr. 14, 2010, *available at* http://www.dci-pal.org/english/display.cfm?DocId=917&CategoryId=1.



DCI-PS' list, such as <u>Ibrahim Mostafa Fraih Sa'id</u> and <u>Ibrahim Abed al-Rahim Rajab Suliman</u>, have been identified by other NGOs (<u>B'Tselem</u> and <u>PCHR</u>) as combatants (Suliman's age is 18 according to PCHR). More disturbingly, although DCI-PS claims to advocate for the rights of children, this publication did not condemn Palestinian terror groups for utilizing child soldiers.

The Palestinian Center for Human Rights (<u>PCHR</u>) is a primarily political organization that constantly seeks to press an anti-Israel agenda in the media. PCHR frequently uses politically charged language and selectively applies human rights concepts to demonize Israel and promote a rejectionist narrative. The group accuses Israel of "ethnic cleansing" and "apartheid," and calls the Israeli army the "Israeli crime occupation forces." PCHR does not attempt to address the human rights implications of Palestinian terrorism. Indeed it frequently refers to Palestinian terrorists as "activists" or as "members of the resistance."

During the December 2008-January 2009 Gaza war, PCHR called the killing of Nizar Rayan a "heinous crime" and a "war crime." PCHR failed to disclose that Rayan was a senior Hamas military commander, and was involved in the planning of many deadly suicide attacks on Israel. He sent his own son out on a suicide bombing mission in 2001 that killed two and wounded many. At the time of his death, his home was being used as part of a complex that served as a weapons storage site and command center for Hamas. Rayan was an architect of the Hamas take-over of Gaza in 2007, and journalist Jeffrey Goldberg called Rayan, "one of the more bellicose Hamas leaders I have known." Rayan told him in a 2007 interview that the "only reason to have a hudna is to prepare yourself for the final battle . . . Israel is an impossibility. It is an offense against God."

In 2008, PCHR filed a lawsuit in Spain seeking the arrest of seven Israeli military officials for the targeted killing of Hamas military leader Salah Shehade – a man responsible for the murder and injury of hundreds of Israeli civilians, including dozens of women in children. As part of its case strategy, PCHR sought to denigrate the Israeli justice system. The Spanish Appeals Court wholly rejected PCHR's claims.

Conclusion

To prevent double standards and bias, it is important that the Committee's Final Report on Israel be credible, accurate and impartial. Reliance on the submissions of the politicized NGOs discussed herein is inconsistent with this requirement. The failure to address negative aspects of Palestinian society that impede women's rights, as well as the obsessive NGO condemnations of Israeli attempts to balance rights within a complex society facing asymmetrical warfare, further highlights this issue.

The Amutah for NGO Responsibility R.A. (ע"ר) # 580465508