NOTE ON LEGAL ISSUES RELATING TO BANS ON IMPORTS OF GOODS PRODUCED IN AREAS OF ISRAELI SETTLEMENT IN THE WEST BANK

A. Compatibility of import bans with existing trade agreements

(a) EU-Israel Association Agreement

1. The EU-Israel Association Agreement (as amended) prohibits quantitative restrictions on imports and all measures having equivalent effect between the EU and Israel (Art. 16).

2. This applies to all goods in free circulation in the EU or Israel, whether or not they originated in the EU or Israel. This is in contrast to the prohibitions of customs duties on industrial products (Art. 8) and most agricultural products (Protocol 1, Arts. 2-3), which apply only to products originating in the EU or Israel (Art. 7 and Protocol 1, Art. 1). The CJEU held in Case C-386/08 *Brita* that the preferential tariff treatment provided by the EU-Israel Association Agreement does not apply to goods originating in the West Bank. However, this does not affect the prohibition of quantitative restrictions, which applies to all trade between Israel and the EU.

3. Products originating in areas of Israeli settlement in the West Bank are normally transferred to Israel within the "Green Line" (the 1949 armistice line) prior to export to other countries. Even if the West Bank and Israel are regarded as different territories, Art. XXIV of the Oslo II Accord and Arts. VIII.1, VIII.10 and IX.1 of the Protocol on Economic Relations (the "Paris Protocol") in its Annex V (as amended) require free movement of goods between them. As goods in free circulation within the Green Line, they then benefit from the prohibition of quantitative restrictions on trade between Israel and the EU under the EU-Israel Association Agreement, even if the territory of Israel for the purpose of this Agreement is regarded as limited to the territory within the Green Line.

4. Art. 27 of the EU-Israel Association Agreement permits restrictions on imports justified on grounds of public morality or public policy (ordre public), provided such restrictions do not constitute a means of arbitrary discrimination or a disguised restriction on trade between the Parties. It is doubtful whether a prohibition of

imports of goods produced in areas of Israeli settlement in the West Bank could be justified on either of these grounds (see paras. 11-12 and 20-24 below), but even if it could, the proviso precluding arbitrary discrimination prevents the EU relying on these grounds, since the EU does not restrict trade with Western Sahara, a territory occupied by Morocco, to which Morocco has transferred a large number of its own citizens.

5. Accordingly, a ban on imports from Israel of goods that originated in areas of Israeli settlement would breach the EU-Israel Association Agreement.

(b) EFTA

6. Similar points apply under the EFTA-Israel Free Trade Agreement: see paras. 5-13 of UKLFI's *Response to the Norwegian consultation on a proposed law banning trade with Israeli settlements*.

(c) GATT

7. Art. XI of the GATT prohibits quantitative restrictions on imports between contracting parties.

8. Areas of Israeli settlement in the West Bank should be treated as Israeli territory for the purposes of WTO agreements, in accordance with the WTO's functional approach to territory, which is based on actual exercise of customs and tariff authority rather than sovereignty under public international law: Olia Kanevskaia, "WTO Rules for Trade with Disputed Territories" (2023) 26 *Journal of International Economic Law* 397.

9. In the case of the GATT, this is reinforced by its Art. XXVI.5(a), which provides that *"Each government accepting this Agreement does so in respect of its metropolitan territory and of the other territories for which it has international responsibility, except such separate customs territories as it shall notify…"*.

10. In any case, even if the GATT and other WTO agreements apply only to Israeli territory within the Green Line, Art. XI applies to goods in free circulation in Israel within the Green Line, including products originating in areas of Israeli settlement in the West Bank: see above.

11. Art. XX of the GATT permits measures necessary to protect public morals *"subject to a requirement that such measures are not applied in a manner that would constitute a means of arbitrary or unjustifiable discrimination between countries where the same conditions prevail or a disguised restriction on international trade."* It is doubtful whether a ban on imports of goods originating in areas of Israeli settlement in the West Bank could be justified as *"necessary to protect public morals"* as interpreted in decisions of WTO Panels. Even if it could be justified on this basis, it would clearly fall foul of the proviso, as interpreted by

WTO Panels, while goods originating in territories such as Western Sahara and Northern Cyprus are not banned.

12. For a discussion of relevant WTO case-law, see Jonathan D.C. Turner and Thomas Howard, "Occupied Territories and the Exceptions to WTO and EU Rules on grounds of Public Morality, Public Order and Public Policy", *European Business Law Review* Vol. 34, Issue 4 (2023) pp695-722. The case-law is also discussed in UKLFI's *Response to the Norwegian consultation on a proposed law banning trade with Israeli settlements* at paras. 30-46 and UKLFI's *Briefing Paper on proposed UK Bans on Trade between UK and Areas of Israeli Settlement in the West Bank* at paras. 77-90.

13. Accordingly, a ban on imports from Israel of goods that originated in areas of Israeli settlement in the West Bank would also breach the GATT.

B. Compatibility of import bans with EU law

(a) Ban imposed by EU

14. Since a ban imposed by the EU on imports from Israel of products originating in areas of Israeli settlement in the West Bank would breach the EU-Israel Association Agreement (paras. 1-5 above), it would also be contrary to EU law: see cases 181/73 *Haegeman v Belgium*, 104/81 *Kupferberg*, *12/86 Demirel*.

15. Moreover, even if such a measure were compatible with the Association Agreement, its predominant purpose would be to further the EU's foreign and security policy. In accordance with the CJEU case-law, it could therefore only be adopted pursuant to a unanimous decision of the European Council and the Council under Art. 24(1) of the TEU: see the analysis by Jonathan Turner and Avraham Russell Shalev, *Politics vs. Policy: Why an EU Ban on Israeli Settlement Goods Would Request Unanimity*.

16. Following a unanimous decision under TEU Art. 24(1), the Council would then need to adopt a binding measure by a qualified majority on a joint proposal from the High Representative for Foreign Affairs and the Commission in accordance with Art. 215 of the TFEU.

(b) Bans imposed by member states

17. National import bans breach EU law under (i) the EU-Israel Association Agreement, (ii) the Common Commercial Policy and (iii) the free movement of goods in the internal market.

(i) EU-Israel Association Agreement

18. Bans by EU member states on imports from Israel of products originating in areas of Israeli settlement in the West Bank also breach EU law because they breach the Association Agreement (paras. 1-5 and 14 above).

(ii) Common Commercial Policy

19. In addition, such national bans breach the EU's exclusive competence for the Common Commercial Policy (CCP) under TFEU Arts. 2(1), 3(1)(e) and the uniformity of the CCP in accordance with TFEU Art. 207(1).

20. Regulation 2015/478 Art. 1(2) provides that imports into the EU from other countries shall not be subject to quantitative restrictions. However, its Art. 24(2) states: *"Without prejudice to other Union provisions, this Regulation shall not preclude the adoption or application by Member States of: (a) prohibitions, quantitative restrictions or surveillance measures on grounds of public morality, public policy [ordre public] or public security …"*

21. As a derogation from a fundamental principle of the EU, Art. 24(2) must be interpreted strictly, similarly to the comparable derogation from the free movement of goods in the internal market under TFEU Art. 36, as the CJEU observed in Case C-399/22 *Confédération Paysanne* at para. 52. Restrictions are permitted under these derogations only where and insofar as they are necessary to achieve the relevant objective specified in those provisions and are not permitted where the same objective could be achieved by a less restrictive measure: Cases 153/78 *Commission v Germany* para. 5; 72/83 *Campus Oil*, paras. 37 and 44; C-367/89 *Richardt* paras. 20–21.

22. Public policy is a concept of EU law: a member state cannot unilaterally determine its content and scope, and its application is subject to supervision by the EU courts: Case C-54/99 *Église de scientologie*, para. 17. In accordance with a long line of decisions of the CJEU, *"recourse by a national authority to the concept of public policy presupposes, in any event, the existence, in addition to the perturbation of the social order which any infringement of the law involves, of a genuine and sufficiently serious threat to the requirements of public policy affecting one of the fundamental interests of society"*. Relevant case-law is summarised at pages 11-12 of a paper by Jonathan Turner.

23. The import of products originating in an area of Israeli settlement in the West Bank into EU member state does not constitute a serious threat to any requirements of public policy affecting any fundamental interest of society. Even if the creation and development of Israeli settlements in the West Bank is considered a serious violation of the rights of Palestinians (which is disputed: see paras. 32-65 below), the same does not apply to the establishment and operation of private businesses,

many of which employ Palestinians on salaries far higher than they can obtain from Palestinian employers: see paras. 75-83 below; paras. 38-45 of UKLFI's *Briefing Paper on proposed UK Bans on Trade between UK and Areas of Israeli Settlement in the West Bank*; and paras. 63-70 of UKLFI's *Response to the Norwegian consultation on a proposed law banning trade with Israeli settlements*.

24. It has been suggested that Israel's alleged contravention of international law is in itself a serious threat to a fundamental interest of society. However,

    (a) The EU case law repeatedly states that recourse by a national authority to the concept of public policy to justify a derogation from a fundamental principle of the EU requires more than the perturbation of the social order which any infringement of the law involves.

    (b) The production of goods by private businesses in areas of Israeli settlement in the West Bank and their import into and sale in EU countries does not breach international law. Even if the transfer of Israeli citizens by the State of Israel into the West Bank or the presence of the State of Israel in the West Bank is regarded as contravening international law (points which are disputed: see paras. 32-65 below), it does not follow that the operation of private businesses there does so: see the judgments of the UK Supreme Court in *Richardson v DPP* at para. 17 and of the Cour d'Appel de Versailles in *AFPS and OLP v Alstom and Veolia*. Terms such as "unlawful settlement goods" are misleading, since the products are normally produced by private businesses, not by "settlements" themselves.

    (c) There is no obligation on EU member states under international law to prohibit the import of goods produced by private businesses in areas of Israeli settlement: see paras. 66-74 below.

    (d) Far from being necessary to prevent Israel's alleged contravention of international law, the prohibition of such imports does not contribute at all to this objective. Instead, it undermines progress towards a two-state solution by harming the Palestinian economy: see paras. 75-83 below.

25. The points made above also apply to corresponding provisions in Regulations 2015/936 concerning certain textile products.

26. Furthermore, Regulation 2015/478 Art. 24(2) does not apply in relation to agricultural products, as the CJEU held in Case C-399/22 *Confédération Paysanne*: see particularly paras. 52-55.

27. As the CJEU noted, Art. 24(2) of Regulation 2015/478 is expressly *"without prejudice to other Union provisions"*. Markets in agricultural products (as listed in Annex I to the TEU and TFEU) are governed by other Union provisions, in particular Regulation (EU) 1308/2013 establishing a common organisation of the

markets in agricultural products. This Regulation addresses trade in agricultural products with third countries comprehensively in its Part III, Arts. 176-205. Art. 176(3) states that import licences issued by a member state shall be valid throughout the Union. Art. 194 empowers the EU Commission to adopt safeguard measures in relation to agricultural products in accordance with the committee procedure but does not authorise member states to adopt national restrictions on imports of such products. The CJEU concluded that the relevant provisions of Regulation 1308/2013 applied to agricultural products instead of Art. 24(2) of Regulation 2015/478.

28. The *Confédération Paysanne* case concerned a proposed national ban on imports of melons and tomatoes from occupied Western Sahara, because of their systematic miss-labelling as produce of the occupying power. There was no suggestion that there was a surge of these imports. Thus, there is no basis for differentiating between national bans on imports from the West Bank on the one hand and the *Confédération Paysanne* case on the other, on the basis that the latter relates only to safeguard measures in the narrow sense of measures to curb sudden surges of imports. In each of these cases the purpose of the national measure is to distinguish between goods originating in an occupied territory from those originating in the occupying power.

(iii) Free movement of goods in the internal market

29. TFEU Art. 34 prohibits quantitative restrictions on imports between EU member states. This applies to products coming from third countries which are in free circulation in another EU member state as well as products originating in the EU: TFEU Art. 28(2). This clearly includes goods coming from Israel that originated in the West Bank.

30. TFEU Art. 36 states that Art. 34 *"shall not preclude prohibitions or restrictions on imports, exports or goods in transit justified on grounds of public morality, public policy [ordre public] or public security …"* but adds *"Such prohibitions or restrictions shall not, however, constitute a means of arbitrary discrimination or a disguised restriction on trade between Member States."*

31. National bans on imports of goods produced by private businesses in areas of Israeli settlement in the West Bank and imported into another EU member state are not justified on grounds of public policy in accordance with the CJEU's case law interpreting TFEU Art. 36, for the reasons set out above (paras. 21-24) in relation to the comparable provision in Art. 24(2) of Regulation 2015/478. Such bans therefore breach TFEU Art. 34.

C. The ICJ's Advisory Opinion of 19 July 2024

32. Those EU member states that have banned or proposed to ban imports from areas of Israeli settlement in the West Bank have relied on the ICJ's *Advisory Opinion of 19 July 2024*, which concluded that Israel's presence in the West Bank is illegal. However, (i) the Opinion is not binding and is defective, and (ii) even if one accepts the Opinion, it does not support banning imports of products produced in areas of Israeli settlement in the West Bank.

(i) Nature and deficiency of the Opinion

33. Advisory Opinions of the ICJ are not binding. Moreover there was a full dissent in this case by the ICJ's Vice President, Judge Sebutinde, which endorsed the view that Israel is entitled to sovereignty over the West Bank in accordance with the doctrine of *uti possidetis juris*, as well as making many other important points, including as to the unsatisfactory nature of the information provided to the Court. Three more of the Judges dissented from the conclusion that Israel's presence in the West Bank is illegal. The impartiality of several of the other judges has been challenged at paras. 10-11 of a *Written Statement of UKLFI and ELNET* of 23 April 2025, submitted to the ICJ in a subsequent case.

34. Furthermore, an Advisory Opinion can only be as valid as the facts on which it is based. Israel declined to participate in this case beyond arguing that the Court should not give the requested opinion. Highly unsatisfactory UN reports were not controverted and the majority of the judges relied on inaccurate and partial information. For example, they supposed that *"Israel's measures in East Jerusalem create an inhospitable environment for Palestinians"* (para. 165). Yet according to a poll carried out by the Palestinian news agency SHFA, 93% of Arab residents of East Jerusalem prefer a continuation of Israeli rule of the united city, and a survey by Israel's Central Bureau of Statistics found that 86% of Arab residents of Jerusalem are satisfied with their lives. The Court's ignorance of this information is particularly serious as the Opinion is founded primarily on the assumption that Israel is violating the rights of Palestinians to self-determination.

35. The seriously problematic nature of the information on which the ICJ relied is discussed in the *Written Statement of ELNET and UKLFI* of 29 September 2023 at paras. 10-33 and the *Written Statement of UKLFI and ELNET* of 23 April 2025 at paras. 15-24.

36. The majority Opinion also ignored legal principles that conflicted with its conclusions, such as the doctrine of *uti possidetis juris*, the continuation of rights and obligations recognised in the Mandate, and the need to determine the will of the people concerned when applying the principle of self-determination: see the

Written Statement of ELNET and UKLFI of 29 September 2023 (particularly paras. 35-97) and the dissent of Vice President Sebutinde.

(ii) The Advisory Opinion does not support banning imports of products produced in areas of Israeli settlement in the West Bank

37. In any case, even if one accepts the majority Opinion, it does not advise that States must or should ban imports of goods produced by private enterprises in areas of Israeli settlement in the West Bank.

38. In considering the Opinion, it is fundamental to recognise the distinction between States and non-State entities. Non-State entities are typically not subject to the same legal obligations as States under international law. Similarly, references in the Opinion to "Israel" refer to the State of Israel, not to Israeli individuals or private Israeli businesses. It is also important to appreciate that nearly all of the trade prohibited by a ban on imports from areas of Israeli settlement in the West Bank is not with "Israeli settlements" as entities, but rather with private businesses operating in or in the vicinity of areas of Israeli settlement.

39. The Opinion does not assert any specific obligation on the part of States to ban imports of products produced in areas of Israeli settlement in the West Bank. It does say in its paragraph 278 that other States have an obligation *"to abstain from entering into economic or trade dealings with Israel concerning the Occupied Palestinian Territory or parts thereof which may entrench its unlawful presence in the territory".* However, (a) this refers to an obligation to abstain from certain actions, not to take any positive step, such as adopting legislation to prevent actions by others; and (b) it refers to an obligation on the part of other States not to enter into certain dealings with the State of Israel - it does not cover dealings with private parties.

40. Paragraph 278 of the majority Opinion goes on to assert that States have an obligation *"to take steps to prevent trade or investment relations that assist in the maintenance of the illegal situation created by Israel in the Occupied Palestinian Territory".* The basis for this assertion is unclear. The Opinion cites it as part of a duty of States to distinguish in their dealings with the State of Israel between Israel's territory and the "Occupied Palestinian Territory", but this point does not appear to relate to distinguishing between Israeli territory and the West Bank. The Opinion cites paras. 122 and 125-127 of its 1971 *Namibia* Opinion, but these do not provide any support for the existence of such an obligation. The assertion that States have a positive obligation to take steps to prevent such activities (as opposed to merely an obligation not to assist in the maintenance of the allegedly illegal situation) also appears to go beyond the responsibilities identified by the International Law Commission in its *Draft Articles on State Responsibility for Internationally Wrongful Acts, with commentaries*.

41. Even if there is such an obligation, it refers to *"trade or investment relations that assist in the maintenance of the illegal situation created by Israel"*. This would require a sufficient nexus between the alleged assistance and the maintenance of the allegedly *"illegal situation"*.

42. The *"illegal situation created by Israel"*, according to the majority Opinion, appears to be the presence of the State of Israel in the West Bank: see paras. 250, 257, 258, 261, 264, 266, 267 and 285(3)-(4) and (7)-(9). The operation of private Israeli businesses in the West Bank is not the presence of the State of Israel there. While the presence of the State of Israel in the West Bank is likely to assist the operation of Israeli businesses in that territory, for example by providing security and reliable governance, it does not follow that the operation of Israeli businesses in the West Bank assists the presence of the Israeli State there. Indeed, a more plausible interpretation of this point in the majority Opinion is that it targets the supply of security products by businesses (wherever located) to the State of Israel that assist the State to maintain its presence in the West Bank.

43. Even if one supposes that the "illegal situation created by Israel" should be interpreted in some broader and vaguer way, it would still not follow that the operation of private businesses in the West Bank assists the illegality. As observed above (para. 24(b)), while States are prohibited by Article 49(6) of the 4th Geneva Convention from transferring part of their population into occupied territories, this does not prohibit the operation of businesses there.

44. Moreover, where normal commercial activities benefit the protected inhabitants of a territory, they are *"regarded as untainted by the illegality of the administration"*. This is known as the *Namibia* exception, since it is based on the 1971 *Namibia* Opinion which is cited in para. 278 of the majority Opinion in this case. Thus, where a business operating in the West Bank employs Palestinian workers and benefits the Palestinian population, purchasing its products and importing them into an EU State does not constitute assistance in the maintenance of an illegal situation. The fact that the paragraphs of the 1971 *Namibia* Opinion which establish this point are cited in the ICJ's 2024 Opinion indicates that the ICJ intended to protect such beneficial activities.

45. The following section demonstrates the considerable benefits provided by Israeli businesses in areas of Israeli settlement in the West Bank to their Palestinian staff, to the Palestinian economy and to economic cooperation that promotes peaceful co-existence. The case for applying the *Namibia* exception in relation to these businesses could hardly be more compelling. Trading with them is lawful and should be encouraged, not prohibited.

D. Practical consequences of banning imports of products originating in areas of Israeli settlement in the West Bank

46. The Palestinian Central Bureau of Statistics (PCBS) reported that in the second quarter of 2026 about 17,600 Palestinians were employed in areas of Israeli settlement in the West Bank (not including Jerusalem), on average salaries twice as high as average salaries paid by Palestinian employers. Prior to October 2023, the PCBS reported that 25,000 Palestinians were employed in these areas.

47. Israeli NGOs have estimated higher numbers. A report by the Israeli Human Rights NGOs, Gisha, LEAP and Kav LaOved, in May 2025 stated at page 3 that Israel was then allowing 32,000 Palestinians to work in areas of Israeli settlement in the West Bank, down from 48,000 prior to the Hamas invasion.

48. The severe impact that European import bans are liable to have on these Palestinians and their families is described in statements made by several such employees. One of these reads:

> *"I have been working at this factory for more than ten years. Thank God, I earn a good salary and I can support my family with dignity. Because of this job, I was able to build a house, provide for my children, and pay for their medicine when they need it.*
>
> *For me, it is strange that people on the other side of the world make decisions about our lives when they don't live here and don't know the reality. We are happy working here. We like the factory and respect the people we work with. If a boycott hurts the factory, the first people who will suffer are us and our families."*

Another states:

> *"I started here as a worker, and today I have a management position in the factory. Over the years, I took professional courses, learned, developed and was given the opportunity to advance both professionally and personally. Today I can support my family with dignity, and I have good working conditions and benefits.*
>
> *I know that if the factory is harmed or closes because of a boycott, it would be very difficult for me to find a job with the same level of pay, rights, and conditions in the Palestinian Authority areas. For me, this is not just a factory. It is my livelihood and my family's future."*

Another explains:

> *"I am very happy with my job here and the way I am treated. We are treated with respect and receive our rights. I also have Jewish friends here whom I work with*

every day. We work together, eat together, and help each other. There are no problems between us.

Many people from our village work here and depend on this factory for their livelihood. If a boycott damages the factory, it doesn't only hurt the business. It hurts families and entire villages, and it damages the relationships we have built between people. If people want peace, they should strengthen this kind of cooperation, not destroy it."

The other statements make similar points. We believe these are representative of tens of thousands of other such employees.

49. Israel initially suspended all permits for Palestinians to work in Israel or in areas of Israeli settlement in Judea and Samaria following the Hamas invasion of Israel in October 2023, since Hamas had used information obtained from Palestinians employed in Israeli communities to plan its attacks and atrocities. Since then, increasing numbers of permits have been restored, particularly in areas of Israeli settlement in the West Bank, but less so in Israel within the Green Line. According to the PCBS, only 35,000 Palestinians were employed in Israel within the Green Line in the second quarter of 2026, compared with 147,000 prior to October 2023.

50. The loss of employment in Israel since October 2023 has had a very serious impact on the Palestinian economy in the West Bank. In 2022 22.5% of employed Palestinian residents of the West Bank were employed in Israel or in areas of Israeli settlement in the West Bank. Moreover, as mentioned above (para. 75), the average salaries of these employees were twice those of employees in Palestinian businesses. In many cases, large extended Palestinian families relied on the salaries of employees working in Israel or in areas of Israeli settlement in the West Bank. These employees' salaries also provided or contributed substantially to the livelihoods of other Palestinians providing goods and services to them (the multiplier effect). Largely as a result of the loss of jobs within Israel, the unemployment rate of Palestinians in the West Bank was 27.9% in the second quarter of 2026 compared with 13% in the third quarter of 2023.

51. In these circumstances, retaining the employment of Palestinians in areas of Israeli settlement in Judea and Samaria and restoring it at least to the level prior to October 2023 are all the more important to preserve a viable Palestinian economy.

52. Income taxes collected by Israel on the salaries of Palestinians employed in areas of Israeli settlement in the West Bank also contribute to financing the Palestinian Authority, to which they are remitted under the Oslo II Accord, as mentioned above (para. 57).

53. The data cited in paragraphs 75-79 above do not cover Jerusalem. Palestinian residents of Jerusalem do not require permits to work in Jerusalem. Large numbers of them work for Israeli businesses throughout the city, including businesses in Israeli suburbs of Jerusalem that are also targeted by import bans adopted or proposed in some EU member states.

54. Sources of data cited in this section and some further details are also provided at paras. 63-70 of UKLFI's *Response to the Norwegian consultation on a proposed law banning trade with Israeli settlements*.

E. EU Values

55. Productive employment of Palestinians alongside Israelis not only provides the livelihood of tens of thousands of Palestinian families; it also contributes to reducing conflict and promoting peace and reconciliation. As well as the statements of Palestinian staff cited in para. 77 above, this is evidenced in a book titled *Defeating Denormalization – Shared Palestinian and Israeli Perspectives on a New Path to Peace* and a video titled *Islands of Peace: Barkan Industrial Park Co-Existence*.

56. The founders of the EU realised that economic integration could end centuries of violent conflict. They resolved in the Preamble to the ECSC Treaty *"to substitute for age old rivalries the merging of their essential interests; to create, by establishing an economic community, the basis for a broader and deeper community among peoples long divided by bloody conflicts; and to lay the foundations for institutions which will give direction to a destiny henceforward shared"*.

57. Those now seeking to ban trade with businesses in areas of Israeli settlement in the West Bank would deny to Palestinians and Israelis the cooperation and coexistence that have secured peace in most of Europe.

58. Instead of undermining beneficial economic cooperation which accords with fundamental EU values, the EU and its member States should focus on targeting the real causes of conflict in the Middle East and the negation of EU values – school materials, teaching and media that incite hatred; and funding of terrorism, whether through the Palestinian Authority, UN organisations or NGOs.

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