

# Third Quarterly Report: Violations of the right to adequate housing in the occupied Palestinian territory

July-September 2009



Activists pulling down a section of the Wall in Qalandiya on 9 November 2009.  
Picture courtesy of Ahmad Mesleh/ Stop the Wall Campaign

CENTRE ON  
HOUSING RIGHTS  
AND EVICTIONS



### Introduction

The right to adequate housing in the occupied Palestinian territory is among the human rights most frequently violated by Israeli authorities, either directly through policies and practice of forced eviction and home demolition, or indirectly by threatening the viability of communities through restrictions on other rights, such as freedom of movement and non-discriminatory service provision.

This quarterly report documents violations of the right to adequate housing in three areas of the occupied Palestinian territory – East Jerusalem, the rest of the West Bank, and the Gaza Strip – during the third quarter of 2009 (July to September). In this issue, the section on East Jerusalem focuses on the increase in Israeli settlements in the part of the city occupied since 1967, while the focus for the rest of the West Bank is on the displacement caused by cutting communities off from their agricultural land on the western side of the Wall. The section on Gaza outlines the catastrophic short and long term impact of the blockade on water and sanitation service provision. In all three areas, Israel violates its obligations under international human rights and humanitarian law and threatens to undermine the viability of a Palestinian state by imposing restrictions on Palestinian society that destroy or disrupt the fabric of communities.

While this issue focuses on violations as a result of settlements, construction of the Wall, and the blockade in Gaza, active home demolitions continued to be a great cause for concern. In the period of January to September 2009, a total of 223 structures, including 92 residential structures, owned by Palestinians were demolished by Israeli authorities in East Jerusalem and Area C. These forced evictions displaced 515 persons, including 262 children. In addition, 504 people, including 303 children, were affected by these demolitions.<sup>1</sup>

### Carving up East Jerusalem

In the third quarter of 2009, a total of seven homes were demolished in East Jerusalem. This number represents a decrease in home demolition in East Jerusalem compared to the first and second quarter, when 14 and 15 homes were demolished respectively. However, the policy that homes built without permits in East Jerusalem can be demolished remains unchanged

and continues to put Palestinians at risk of forced eviction. In the meantime, it appears that policies and practices that will increase the number of settlers in East Jerusalem are intensifying, with a number of cases of settler occupation of houses reported in the 3<sup>rd</sup> quarter of the year. Occupation of homes by settlers is a regular occurrence in East Jerusalem, and often accompanied by violence during forced evictions carried out by settlers.

On 2 August 2009, two homes in Sheikh Jarrah were handed over to Israeli settlers after the residents lost a protracted legal battle in court. The forced eviction made 53 persons, including 20 children, homeless. The houses are part of 27 buildings, housing approximately 300 Palestinian refugees, and were built in 1956 on the basis of an agreement between UNRWA<sup>2</sup> and Jordan. The court found that the land is owned by the settlers, although similar claims of Palestinian refugees to reclaim lost land are regularly rejected by the courts. Construction of a new settlement with 200 units is planned for the area.<sup>3</sup> In a similar case in Sheikh Jarrah, a settler organisation claims ownership over 33 housing units, home to about 175 people, most of them refugees. The case is pending in court. On 26 July 2009, settlers occupied one of the buildings.

In total, approximately 2,000 settlers were living in Palestinian neighbourhoods of occupied East Jerusalem at the beginning of 2009. Significant expansion of existing illegal settlements and establishment of new ones are planned in five neighbourhoods of East Jerusalem. In total, 377 new housing units are under construction, while plans for a further 444 units are awaiting approval.

- Mount of Olives: 280 housing units under construction in two locations, 104 housing units awaiting approval;
- Silwan: 20 housing units awaiting approval;
- Sheikh Jarrah: 31 housing units approved, 290 housing units awaiting approval;
- South East Jerusalem: 66 housing units under construction;
- Old City: 30 housing units awaiting approval.<sup>4</sup>

Under international law, East Jerusalem is part of the Palestinian territory unlawfully occupied since 1967, and not – as claimed by Israel – part of a

single Jerusalem municipality belonging to Israel. Indeed, the international community regularly reaffirms the status of East Jerusalem as unlawfully occupied. This renders settlements illegal under Article 49 of the Fourth Geneva Convention, which prohibits the transfer of the population of the occupying power into the occupied territory. The settlements in East Jerusalem and on the outskirts of the city's urban core are having the combined effect of cutting

East Jerusalem off from the West Bank and making access by the Palestinian population from and to East Jerusalem increasingly difficult or impossible. The transfer of the Jewish population to East Jerusalem coupled with policies that lead to the displacement of the Palestinian population from East Jerusalem, amount to concerted policies which change the demographic status of occupied East Jerusalem, a silent ethnic cleansing also in breach of the Geneva Conventions.

### The New Jerusalem Master Plan

The current planning and housing crisis in occupied East Jerusalem is well documented. Israeli authorities have failed to provide adequate planning for the expansion of Palestinian neighbourhoods, much of the land that is allocated for Palestinian construction is already built up, Palestinians face significant obstacles to gain permits approving construction, there is a serious shortage of housing available for Palestinian residents of East Jerusalem and Palestinian East Jerusalemites are allocated a much smaller share of budgetary resources than their Jewish counterparts. All of these factors have led to Palestinians being forced to build illegally and risk the demolitions of their homes. In fact, since 1967 an estimated 2,000 Palestinian homes have been demolished in East Jerusalem, with 670 of these alone being demolished between 2000 and 2008, due to lack of permits.<sup>5</sup> Currently, there are thousands of pending demolition orders against Palestinian homes. This situation is compounded by the expropriation of Palestinian land for Jewish construction. From the 17,300 acres of land in East Jerusalem in 1967, 5,900 have been expropriated for illegal Jewish settlements.<sup>6</sup> Of the 11,400 acres remaining, construction is permitted on only 2,200 acres with the remainder designated as 'green areas' or 'public spaces'.<sup>7</sup>

The new Jerusalem Master Plan is to replace the old plan which dates back to 1959, and will guide urban planning in Jerusalem, including zoning and the issuing of construction permits. The question is, whether this Plan will make a significant improvement to the lives of Palestinian residents in East Jerusalem.

First of all, it must be noted, that in the development of the new Master Plan, which included 39 professional workers and 31 members of the steering committee, only one Palestinian was involved.<sup>8</sup> Furthermore, alternative plans submitted to the municipality were not taken into consideration.<sup>9</sup> The chapter of the Jerusalem Master Plan which deals with East Jerusalem recognises that difficulties in receiving construction permits and lack of an adequate budget poses problems for residents of East Jerusalem, but considers the major issue that needs to be addressed as "the disregard by the residents of the planning and construction law on the one hand, and on the other hand, the major weakness of the enforcement mechanism."<sup>10</sup>

The new Jerusalem Master Plan is based on the premise of the development of Jerusalem, including East Jerusalem, as the capital of Israel. This Plan is also designed to achieve the goal of ensuring a significant Jewish majority across the city, including East Jerusalem.<sup>11</sup> Both the designation of capital status and the transfer of Israeli populations into East Jerusalem contravene Israel's obligations under international law. The plan explicitly states that it wishes to ensure that there is a Jewish majority in the city by having a 60:40 Jewish/Palestinian ratio by 2020, while maintaining an eventual goal of a ratio of 70:30.<sup>12</sup> Theoretically, the new master plan allocates more land for Palestinian construction of residential areas, but in reality Palestinians are unable to build there, due to lack of adequate infrastructure and a lack of adequate resources to address this problem, or part of the areas designated for expansion and expansion are already 'illegally' built up.<sup>13</sup> It has been estimated that even if the new master plan is implemented there will still be a shortage of some 10,000 housing units in East Jerusalem.<sup>14</sup>

The new Master Plan has been submitted by the Jerusalem Municipality to the Ministry of Interior for approval. However, the Minister of Interior rejected the plan as according to him, there is too much land allocated to Palestinians.<sup>15</sup> The master plan is now in deadlock, returned to the municipality, which cannot make the changes requested by the Minister without re-submitting the Master Plan to the planning committee.

### The Wall in the West Bank

In 2002, Israel began the construction of a Wall to separate Israel from the West Bank, ostensibly to prevent suicide attacks. Once complete, approximately 85 per cent of the Wall will stand on occupied West Bank territory to the East of the 'Green Line', leading to a *de facto* illegal annexation of over 10 per cent of West Bank land. To date, construction of approximately 59 per cent of the Wall is complete. In 2004, the International Court of Justice (ICJ) in an Advisory Opinion declared that the construction of the Wall is contrary to international humanitarian and human rights law and a disproportionate response to Israel's security concerns. The Court found that Israel is obliged to cease construction, to dismantle the Wall and to make reparation for all damages caused by the construction of the Wall. Whilst Advisory Opinions are not legally binding, the Court's findings are an authoritative interpretation of international law. Both the UN General Assembly and Human Rights Council have issued

resolutions calling on Israel to comply with the Advisory Opinion. Israel, however, continues to ignore the ICJ's Opinion and related UN resolutions.

The Wall and the associated regime of gates, military checkpoints and limited permits are having a debilitating impact on Palestinian society as a whole and violate rights of individuals under international human rights and humanitarian law. While many human rights are affected, one particular human rights violation associated with the Wall is the violation of the right to adequate housing through forced eviction. Construction of the Wall by Israel continues to displace Palestinian families from their homes, either through acts of demolition or through the imposition of ever increasing restrictions that ultimately pressure families to leave their homes. This latter, less visible form of eviction and displacement, known as constructive forced eviction and displacement, is the focus of this section.



### **NO ENTRY: Facts and figures on restricted access to agricultural land**

- 67 communities (about 222,000 individuals) had land isolated between the Wall and the Green Line in 2007;
- 170,000 dunams of fertile agricultural lands are affected by the Wall, equalling 10.2 per cent of the total area cultivated in the West Bank, with an average economic value of USD 38 million, equal to roughly 8 per cent of Palestinian agricultural product;
- The permit regime to access land behind the Wall has become increasingly stringent since 2003 and now requires proof of a 'connection to land' - often impossible to show under traditional ownership practices;
- The agricultural sector accounts for between 11-20 per cent of the Palestinian economy, employing about 15 per cent of the formal, and up to 39 per cent of the informal workforce;
- Dependency on agriculture has increased in recent years due to lack of access to the Israeli labour market and increasing movement restrictions inside the West Bank.

[UN OCHA OPT, Five Years After the International Court of Justice Advisory Opinion, July 2009, p.5, and World Bank, Economic Effects of Restricted Access to Land in the West Bank, October 2008, p. 16]

Palestinian towns and villages in immediate vicinity of the Wall are subject to a plethora of restrictions, resulting in the slow destruction of livelihoods of individuals and communities. This applies both where urban dwellers are compelled to move to other population centres because

their businesses become unviable, as well as in cases where residents of rural areas migrate to urban centres due to restricted access to their farmland.

For example, in Bir Nabala, a town between Jerusalem and Ramallah, the Wall has resulted in

unemployment levels of 67 per cent, and many residents are leaving the area. Together with the towns of Al Jeeb, Al Jadeira and Old Beit Hanina, Bir Nabala is encircled by the Wall. Since construction of the Wall began, the number of Jerusalemites living in Bir Nabala has declined from 2,000 to less than 200.<sup>16</sup>

Along almost the entire route of the Wall, significant portions of agricultural land lie to the West of the Wall and are therefore cut off from the West Bank. Farmers who want to access the land between the Wall and the Green Line (in the so called “Seam Zone”) require permits from Israeli authorities. However, these permits are only issued to a fraction of owners and users of the land. 68 per cent of those who own land behind the Wall stated in a recent survey that they cannot access their land as a result of the Wall.<sup>17</sup> In addition, entry of tools and machinery is heavily curtailed and restricted opening times at gates and frequent unscheduled closures further impede the possibility of viable agricultural production. According to UN monitoring, the permit regime has severely curtailed agricultural production, undermined rural livelihoods and is eroding the rural economy.<sup>18</sup> As a result, many families are compelled to leave their homes once livelihoods become unviable. A recent survey has shown that 38 per cent of households in high risk areas [Area C of the West Bank and the Gaza buffer zone] changed their places of residence following loss of their job or source of income, and a further 41 per cent had thought about changing their residence for the same reason, but could not.<sup>19</sup>

Under international human rights law, forced evictions are defined as “the permanent or temporary removal against their will of individuals, families and/or communities from the homes and/or land which they occupy, without the provision of, and access to, appropriate forms of legal or other protection.”<sup>20</sup> While forced evictions in the oPt most commonly take the form of home demolitions, the *de facto* confiscation of land and housing by making it inaccessible to its owners also arises to a forced eviction and therefore a violation of the right to adequate housing, particularly where those affected are compelled to move away from their home and land. The resultant internal displacement is in itself a human rights violation, and almost always associated with further

infringements in the enjoyment of human rights, including freedom of movement and the rights to livelihood, food and water.

### Gaza water and sanitation crisis

Israel’s military assault on Gaza in December 2008 and January 2009, ‘Operation Cast Lead’, caused extensive damage to water and sanitation services and facilities. The UN Fact Finding Mission on the Gaza Conflict investigated several incidents involving the destruction of water installations including water wells and sewage treatment plants. In its report, the Goldstone Report, the mission highlighted the case of a direct strike on the raw sewage lagoons of the Gaza Waste Water Treatment Plant, which caused the outflow of more than 200,000 cubic metres of raw sewage into neighbouring farmland. The report concludes that “[t]he circumstances of the strike on the lagoon suggest that it was deliberate and premeditated”.<sup>21</sup> The mission also highlighted the case of the Namar Wells complex in Jabalya where two water wells, pumping machines, a generator, fuel storage, a reservoir chlorination unit, buildings and related equipment were all destroyed in multiple air strikes on the first day of Israel’s aerial bombardment of the Gaza Strip. The Fact Finding Mission concluded that it found ‘no grounds to suggest that there was any military advantage to be had by hitting the wells and noted that there was no suggestion that Palestinian armed groups had used the wells for any purpose’.<sup>22</sup>

Indeed the UN Fact Finding mission concluded that ‘there was a deliberate and systematic policy on the part of the Israeli armed forces to target ... water installations’.<sup>23</sup> It further concluded that ‘in the destruction of private residential houses, water wells, water tanks, agricultural land and greenhouses there was a specific purpose of denying them for their sustenance to the population of the Gaza Strip’.<sup>24</sup> The mission also examined whether the series of acts that deprived Palestinians in the Gaza Strip of their means of sustenance, including water, could amount to persecution, a crime against humanity. The mission concluded that ‘some of the actions of the Government of Israel might justify a competent court finding that crimes against humanity have been committed’.<sup>25</sup>

Recovery efforts following the conflict have been impeded due to the continuing Israeli imposed blockade on the Gaza Strip, which entered its third year in July 2009.

The associated almost complete closure of Gaza's border crossings for almost all goods and the reduced supply of fuel and electricity continue to exacerbate the living conditions of Gaza's population of approximately 1.5 million. Since the beginning of the blockade, the average number of truckloads per day allowed into Gaza has been reduced to one fifth, from an average of 583 in the first five months of 2007, to an average of 112 during the ongoing blockade. Approximately 70 per cent of imports have been food products, while import of material for construction, industry and agriculture has been heavily curtailed.<sup>26</sup>

These restrictions have led to a catastrophic humanitarian situation in the Gaza Strip and the near complete paralysis of the water and sanitation sector in Gaza. Some of the consequences of the blockade on water and sanitation service provision are:

- Operation Cast Lead caused around US \$6 Million worth of destruction to major water and sanitation infrastructure. Yet, due to the blockade, humanitarian recovery has been delayed, caused by an inability to access materials such as cement, pumps and pipes. Some 1250 tonnes of cement is currently needed to repair water tanks alone.
- 10,000 people in northern Gaza alone do not have access to running water; an additional 60 per cent of the population do not have continuous access to water.
- 90 to 95 per cent of water extracted from the Gaza aquifer does NOT meet WHO safety standards for drinking water.
- 80 million litres (about 30 Olympic sized swimming pools) of raw and partially treated sewage flow into the environment every day.
- Waste water treatment plants run above capacity, releasing unsafe wastewater into the sea. Projects to increase capacity are delayed due to the blockade.
- 60 per cent of households are connected to a sewerage network. Unconnected households use cess pits, which are often not properly emptied due to the current economic climate.

- Direct discharge of untreated sewage into the environment has increased after operation Cast Lead, as house connections were destroyed.
- The poor quality of water and sanitation services is associated with an increase in watery diarrheal diseases and methemoglobinaemia or "blue baby syndrome". Methemoglobinaemia is a disease caused by nitrate contamination, from untreated sewage, which prevents haemoglobin in the blood from binding with oxygen and particularly affects infants. The disease can cause symptoms such as breathing difficulties, fatigue, headaches and even loss of consciousness and can seriously impact upon a child's development.
- Aquifer pollution and salinisation continue to rise as long as sewage infiltration and over extraction persist.<sup>27</sup>

Indeed, the condition of the Gaza aquifer is so critical that a recent environmental assessment by the United Nations Environment Programme (UNEP) recommends, among other measures, the immediate halt of all abstraction from the Gaza aquifer along its entire length to avoid further deterioration that could take centuries to reverse.<sup>28</sup> The UNEP report further recommends that a comprehensive study should be conducted on the prevalence of methemoglobinaemia in the Gaza Strip and that safe water should immediately be provided to all children under one year old, in order to ensure their health is protected.

Not only causing a critical humanitarian and environmental crisis, the blockade also leads to serious violations of the human rights of the Gazan population, not least their right to access adequate supplies of clean water and safe sanitation, as well as associated rights such as the right to an adequate standard of living and the right to health. Children, the elderly and other vulnerable groups suffer the most, particularly in terms of adverse health impacts.

Israel has attempted to justify the blockade on the basis of security threats from Hamas and other armed groups in Gaza. A failure to prevent rocket attacks on southern Israeli communities represents a breach of international humanitarian law by the Gaza administration. However, to punish the civilians of Gaza for the acts and the

political position of their administration is immoral and constitutes collective punishment in violation of international humanitarian law. The United Nations Committee on Economic, Social and Cultural Rights has stated that States “should never impose embargos or similar measures that prevent the supply of water, as well as goods and services essential for securing the right to water. Water should never be used as an instrument of political and economic pressure.”<sup>29</sup>

Furthermore, Israel, as an occupying power maintaining effective control over Gaza, is obliged under Article 59 of the Fourth Geneva convention to allow free passage of vital humanitarian assistance into the Gaza Strip. This must include materials needed for the repair and maintenance of water and sanitation service facilities to immediately improve the humanitarian situation and to ensure that water and sanitation service provision is restored to an adequate standard.

### Recommendations

In light of the widespread violations of international human rights and humanitarian law that are occurring in the occupied Palestinian territory, COHRE makes the following recommendations:

#### To the Government of Israel

- Immediately end all construction of new, and expansion of existing, settlements in East Jerusalem and all other parts of the West Bank, including by revoking construction permits for planned settlements;
- Immediately end the blockade of the Gaza strip and allow for the entry of vital construction materials into the Gaza strip;
- Immediately allow for easy access of Palestinians to their farmland beyond the Wall, including for owners and farm workers, to ensure viable agricultural production can be carried out and Palestinian’s rights to livelihood and food security are ensured;
- Comply with the Advisory Opinion of the International Court of Justice and subsequent resolutions by UN bodies to end all violations occurring as a result of the construction of the Wall;
- Ratify the Optional Protocol to the International Covenant on Economic, Social and Cultural Rights which would enable those whose economic, social and cultural rights are violated to seek justice at the international level;
- End the unlawful occupation of Palestinian territory, including East Jerusalem, and allow Palestinians to exercise their right to self-determination.

#### To the various UN bodies and the international community

- Continue to exert necessary pressure on Israel aimed at ending and remedying violations of the right to adequate housing and other human rights through the destruction of homes, the construction of settlements and the Wall and through the blockade on the Gaza strip;
- Support Palestinian communities in their struggle to resist home demolitions and the expansion of settlements by providing them with practical assistance designed to improve their security of tenure;

#### To the Conference of the High Contracting Parties of the Geneva Convention relative to the Protection of Civilians in Times of War (Fourth Geneva Convention)

- Immediately convene with a view to fulfilling the joint obligation to ensure respect for the Fourth Geneva Convention and to improve the deteriorating humanitarian situation in the occupied Palestinian territory.

### To the European Union and EU member states

- Immediately suspend the EU-Israel Association Agreement, in line with Article 2 which states that relations between the parties shall be based on a respect for human rights;
- In light of the wide spread destruction of homes and other civilian infrastructure during Israel's military assault on Gaza, the EU should apply the *European Union Guidelines on Promoting Compliance with International Humanitarian Law* (2005) which call for the imposition of sanctions and other restrictive measures to ensure compliance with international humanitarian law and bring perpetrators of violations to justice before domestic courts or an international criminal tribunal.
- Demand compliance with international human rights and humanitarian law in the upcoming review of the EU-Israel European Neighbourhood Action Plan, which explicitly includes respect for human rights and international humanitarian law.

### Endnotes

<sup>1</sup> UN OCHA oPt, *Humanitarian Monitor*, September 2009, available at <http://www.ochaopt.org/>

<sup>2</sup> UNRWA, the United Nations Relief and Works Agency for Palestine Refugees in the Near East, is tasked with providing humanitarian assistance to Palestinian refugees.

<sup>3</sup> UN OCHA oPt, *Humanitarian Monitor*, August 2009, available at <http://www.ochaopt.org/>

<sup>4</sup> Ir Amim, *Israeli Settlement in Palestinian Communities in East Jerusalem, Snapshot*, August 2009, available at <http://www.ir-amim.org.il/Eng/Uploads/dbsAttachedFiles/NewSettlementsEng.doc>

<sup>5</sup> UN OCHA, *The Planning Crisis in East Jerusalem: Understanding the Phenomenon of 'illegal construction'*, April 2009.

<sup>6</sup> Information gathered during presentation by Dr. Meir Margalit, member of the Jerusalem Municipal Council and Coordinator of the Israeli Committee Against House Demolitions (ICAHAD), OCHA Displacement Working Group, 13 October 2009.

<sup>7</sup> Ibid.

<sup>8</sup> Meir Margalit, *The New Jerusalem Master Plan*, Palestine-Israel Journal of Politics, Economics and Culture, Vol 12 No. 1, 2005.

<sup>9</sup> Ibid.

<sup>10</sup> Ibid.

<sup>11</sup> Jerusalem Municipality, *The Proposed Plan and the Main Planning Policies*, p. 8, unofficial translation into English, available at [http://www.pcc-jer.org/arabic/Publication/jerusalem\\_master\\_plan/jerusalemplan\\_eng.html](http://www.pcc-jer.org/arabic/Publication/jerusalem_master_plan/jerusalemplan_eng.html)

<sup>12</sup> Ibid, *Chapter 7: Population and Society*, unofficial translation into English.

<sup>13</sup> Meir Margalit, *Supra* note. vi.

<sup>14</sup> Ibid.

<sup>15</sup> Ibid.

<sup>16</sup> For an account of the impact of the Wall on Bir Nabala and similar localities in the West Bank, see Palestinian Grassroots Anti Apartheid Wall Campaign and Ma'an Development Centre, *Palestinian Towns and Villages: Between Isolation and Expulsion*, December 2008, available at <http://stopthewall.org/activistresources/1583.shtml>

<sup>17</sup> Save the Children UK, *Life on the Edge: The Struggle to Survive and the Impact of Forced Displacement in High Risk Areas of the Occupied Palestinian Territory*, October 2009, p. 8.

<sup>18</sup> UN OCHA OPT, *Humanitarian Monitor*, July and August 2009, available at <http://www.ochaopt.org/>

<sup>19</sup> Save the Children UK, *Life on the Edge: The Struggle to Survive and the Impact of Forced Displacement in High Risk Areas of the Occupied Palestinian Territory*, October 2009, p. 8.

<sup>20</sup> UN Committee on Economic Social and Cultural Rights, *General Comment No. 7, The right to adequate housing: forced evictions*, 1997, U.N. Doc E/1998/22, annex IV, para. 3.

<sup>21</sup> Report of the UN Fact Finding Mission on the Gaza Conflict, UN Doc. A/HRC/12/48, para 52 (15 Sept. 2009).

<sup>22</sup> Ibid.

<sup>23</sup> Ibid, para. 54

<sup>24</sup> Ibid, para. 73.

<sup>25</sup> Ibid, para. 75.

<sup>26</sup> UN OCHA OPT, *Locked In: The Humanitarian Impact of Two Years of Blockade on the Gaza Strip*, August 2009, p. 5.

<sup>27</sup> Information in the above list from: EWASH Advocacy Task Force, *The impact of the blockade on water and sanitation in Gaza*, September 2009; UN OCHA OPT, *Locked In: The Humanitarian Impact of Two Years of Blockade on the Gaza Strip*, August 2009; UN, AIDA Press Statement, *Humanitarian Organisations deeply concerned about the ongoing water and sanitation crisis in Gaza*, 3 September 2009; World Bank, *West Bank and Gaza: Assessment of Restrictions on Palestinian Water Sector Development*, April 2009, p. 30.

<sup>28</sup> UNEP, *Environmental Assessment of the Gaza Strip following the escalation of hostilities in December 2008 – January 2009*, September 2009, p. 70-71.

<sup>29</sup> UN Committee on Economic, Social and Cultural Rights, *General Comment No. 15: The Right to Water* (2002), para. 32.