

**Urgent Appeal to UN Special Procedures on the Imminent Threats on the Remaining
Palestinian Christian Presence on Both Sides of the Green Line due to Israel's Ongoing
Breaches of International Humanitarian & Human Rights Law**

Submitted by:

The Balasan Initiative for Human Rights – Palestine



For the attention of:

- **Special Rapporteur on the human rights situation of in the OPT, Ms. Francesca Albanese;**
- **Special Rapporteur on freedom of religion or belief, Ms. Nazila Ghanea;**
- **Special Rapporteur on minority issues, Mr. Nicolas Levrat;**
- **Special Rapporteur in the field of cultural rights, Ms. Alexandra Xanthaki;**
- **Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel.**

Date of Submission: 15 August 2025

I. Context

The Balasan Initiative for Human Rights – Palestine (“**BIHR**”) submits this urgent appeal to the esteemed Special Rapporteurs to draw immediate attention to the imminent threat facing the remaining Palestinian Christian presence on both sides of the Green Line; in the occupied Palestinian territory (“oPt”), including the eastern part of Jerusalem and the Gaza Strip, and inside the Green Line, as a result of Israel’s ongoing breaches of international humanitarian and human rights law. **Israel’s systematic and cumulative violations against Christian communities’ fundamental rights, notably in the context of the ongoing case of Genocide in Gaza, as well as the intensified annexation policies in the oPt, have rendered the remaining Palestinian Christian presence in its homeland very fragile, and placed it under a serious threat of being eroded.**

In recent months, the combined impacts of Israel’s genocide in Gaza, the heavy militarization of the occupied West Bank, and policies of annexation have created a coercive environment that has forcibly displaced families, eroded community life, and accelerated the migration of the Palestinian Christian population across Palestine. The result is a demographic decline that now places the very continuity of Palestinian Christians’ presence in their ancestral homeland at risk.

Christian towns in the West Bank have continued to experience a sharp demographic drop: Today, Christians make up less than 1% of the population in the oPt, with only around 500 remaining in Gaza.

Even before the severe escalation that ensued 7 October 2023, survey data reveals the pressures behind this decline: **83% of Palestinian Christians fear settler violence and forced displacement**; 67% express concern over Israel’s annexation plans; and 62% believe Israel ultimately seeks to expel Christians from their homeland, with many reporting regular checkpoint crossings and land confiscation¹. Data reflects a significant deterioration on this already volatile human rights situation. **The BIHR considers it its duty to raise these urgent concerns before your esteemed mandates with this submission that serves to also update the esteemed UN Special Rapporteurs on the situation of the Palestinian Christian presence since the [first submission](#) was made by BIHR in this regard, in November 2023.**

¹ Christianity Today, “Survey: Palestinian Christians Emigrate Over Fears for Their Future,” 6 August 2020, <https://www.christianitytoday.com/2020/08/palestinian-christians-survey-israel-emigration-one-state/>.

II. The Current Situation

1. In The Gaza Strip

Gaza's ancient and once vibrant Palestinian Christian population has now dropped to less than 500 Christians.² They witness in full Israel's genocide in Gaza that has, so far, killed 59,219 Palestinians, and injured 143,045 Palestinians between 7 October and 28 May 2025,³ amidst the collapse of the entire health system as a result of Israel's systemic targeting of hospitals in Gaza. Even in such small numbers, and as they sheltered in their churches, Israel's direct military attacks on churches killed at least 25 Palestinian Christians in Gaza, and injured at least 15 Palestinian Christians.

Moreover, Israel's military offensive has led to the destruction of 160,000 housing units and damage to an additional 276,000, accounting for 92% of the total housing units (436,000). This mass destruction of the Gaza strip included the widespread destruction of places of worship, with over 79% of mosques and at least four churches damaged or destroyed as of July 2025.⁴

Among the churches destroyed in Gaza is the 3rd most ancient church in the world, Saint Porphyrius Church. On 10 October 2023, the Greek Orthodox Church of Saint Porphyrius, one of the oldest Christian worship sites in the world, was severely damaged in an Israeli airstrike. Nine days later, on 19 October 2023, Israel targeted the church again, killing 20 Christians who were sheltering there.⁵

Further attacks include:

- 16 December 2023: The Convent of Sisters of Mother Theresa (part of Holy Family Parish) was rendered uninhabitable by Israeli rocket fire, and two Christian women were fatally shot by Israeli forces on the premises.⁶
- July 2025: Gaza's singular Catholic church sustained a bombing while providing refuge to elderly individuals and children. This attack led to three fatalities and a minimum of ten injuries. Among the deceased were the parish's 60-year-old custodian and an 84-year-old woman who had been receiving psychosocial assistance within a Caritas tent situated on the church premises.⁷

² ZENIT: "How many Christians remain in Gaza after nearly two years of war? These are the data" (2025): <https://zenit.org/2025/07/23/how-many-christians-remain-in-gaza-after-nearly-two-years-of-war-these-are-the-data>

³ UN OCHA: "Humanitarian Update Report" <https://www.ochaopt.org/content/humanitarian-situation-update-307-gaza-strip>

⁴ AA News, Timeline: Israel strikes 3 churches in Gaza since start of war, 20 July 2025, <https://www.aa.com.tr/en/middle-east/israel-s-attacks-destroy-79-of-gaza-mosques-3-churches/3469056>.

⁵ *Ibid.*

⁶ The Guardian, Christian patriarchs make joint visit to shelled church in Gaza, 18 July 2025, <https://www.theguardian.com/world/2025/jul/18/christian-patriarchs-make-joint-visit-to-shelled-church-in-gaza>

⁷ Al Jazeera, Israel bombs Gaza's only Catholic church sheltering elderly and children, 17 July 2025, <https://www.aljazeera.com/news/2025/7/17/israel-bombs-gazas-only-catholic-church-sheltering-elderly-and-children>

Like all Palestinians in Gaza, the remaining Palestinian Christian population suffers from very high levels of food insecurity as a result of Israel's use of starvation as a method of warfare. Since March 2025, Israel has halted the entry of all humanitarian aid into Gaza. As of August 4, more than 175 Palestinians have died from starvation, 94 of those deaths were children. 89 of these deaths occurred from July 25 to August 4. Over 1,487 people have been killed and more than 10,678 injured while attempting to obtain food at the "aid centers".⁸ The critical lack of food and essential provisions is compelling Palestinians to approach their own death as they attempt to reach the Gaza Humanitarian Fund (GHF) sites and humanitarian convoys.⁹ The full extent of malnutrition-related deaths may be underreported.

The ongoing genocide in Gaza has had a profound impact on the Palestinian Christian community and places them and their historic presence in Gaza at serious risk of extinction.

2. In Occupied Jerusalem

Israel's occupation and illegal annexation of Jerusalem came with the application of rigid discriminatory policies aimed at fragmenting and reducing the Palestinian population of Jerusalem for the benefit of a Jewish Israeli majority. This included Jerusalem's Christian population, which has been negatively affected by Israeli policies for decades— and is currently about 10,000, or just over one percent of the city's population, compared with a quarter of the population a century ago. According to a December 2024 survey conducted by the Rossing Center, **36 percent of Christians in Israel and East Jerusalem are considering emigrating, with Jerusalemites citing sociopolitical concerns as the dominant reason.**¹⁰ Israeli measures targeting the Palestinian Christian community in Jerusalem include:

a. Church Taxation Attempts in Violation of the *Status Quo*

Israel's repeated attempts to impose taxes on church properties in Jerusalem signal a troubling shift in longstanding historical and political arrangements, i.e., the Jerusalem *Status Quo*,¹¹ which has traditionally exempted churches and church-affiliated institutions from taxation. However, in recent years, Israel's Jerusalem Municipality has repeatedly tried to impose municipal taxes "Arnona" from church-owned properties, including guest houses, schools, among others. The first attempt to tax the churches was in 2018, when the Jerusalem Municipality announced plans to collect approximately 650 million shekels in taxes from church-owned properties not used for worship, including schools, guesthouses, and clinics. This marked the first major attempt to revoke the historic tax-exempt status of churches under the longstanding *Status Quo*. Upon serious

⁸ See full report B'Tselem: "[Our Gencide](#)", August 2025.

⁹ *Ibid.*

¹⁰ Rossing Center for Education and Dialogue: "Briefing: Survey of Palestinian/Arab Christians in Israel and East Jerusalem, December 2024."

¹¹ See the Palestinian NGA's full report: <https://www.nad.ps/sites/default/files/03012018.pdf>

objections by church leaders, including the first time closure of the Holy Sepulcher Church to protest, Israel put its plans on hold.¹²

Israel attempted to impose taxes on the church again in June 2024, as the Jerusalem Municipality issued warning letters and initiated legal actions demanding payment of municipal taxes on properties owned by Christian institutions outside of worship use.¹³ Church leaders publicly denounced these measures and considered a deliberate effort to undermine the Christian presence and violate the centuries-old *Status Quo* agreements.

More recently, since early 2025, Israel took bolder and more aggressive measures to impose taxes on the Church, and moved from issuing warnings and threats to actual seizure threats and freezing of bank accounts. On 14 August, 2025, Israeli authorities froze all bank accounts of the Greek Orthodox Patriarchate in Jerusalem over a long-standing property tax dispute, escalating tensions with Christian institutions in Jerusalem.¹⁴ A statement by Protecting Holy Land Christians, a group founded by the Greek Orthodox Patriarch of Jerusalem, said the freeze has left the Patriarchate unable to pay salaries to clergy, teachers, and staff.¹⁵

Earlier, in early 2025, the Armenian Patriarchate of Jerusalem faced foreclosure orders and potential auction of historic properties over disputed tax debts claimed by the Jerusalem Municipality. The Patriarchate challenged the debt as legally unfounded, and church heads from across denominations described the municipal demands as "legally dubious and morally unacceptable".

Far from the Israeli claims that the imposition of taxes on churches is part of a fiscal policy; it disproportionately harms the Palestinian Christian community, which relies heavily on church-run institutions for education, healthcare, housing, and employment. Many of these services are offered at low cost or for free, filling critical gaps in services as a result of Israeli discrimination policy in Jerusalem. Taxing these institutions could be detrimental to the Palestinian Christian communities in Jerusalem and could force churches to reduce or shut down essential services, worsening the socio-economic conditions of an already shrinking Christian population and the church's ability to preserve them in their homeland and in Jerusalem, a city of great religious significance in the Christian world and for Palestinians.

¹² Haaretz: "Jerusalem to Tax Church Properties, Ending Centuries-old Policy" (February 2018), available at: <https://www.haaretz.com/israel-news/premium-jerusalem-to-tax-church-properties-ending-centuries-old-policy-1.5823703>

¹³ Wafa News: "CMEP expresses solidarity with Holy Land churches in face of Israeli taxation attempt" (June 2024), available at: <https://english.wafa.ps/Pages/Details/145399?utm>

¹⁴ MEMO: Israel freezes bank accounts of Greek Orthodox Patriarchate in Jerusalem over property tax dispute (14 August 2025), <https://www.middleeastmonitor.com/20250814-israel-freezes-bank-accounts-of-greek-orthodox-patriarchate-in-jerusalem-over-property-tax-dispute/>

¹⁵ *Ibid*

b. Church Land Dispossession

Israel has consistently attempted to acquire Church land through “deals” that result in Israeli or settler organizations gaining control over historically Christian properties in Jerusalem, especially in and around the Old City. These deals often involve strategic takeovers of lands/ property in highly sensitive areas with great symbolism, through opaque transactions, taking advantage of corruption as such ‘deals’ are concluded without transparency or consultation, and deception. They bring serious consequences for the Palestinian Christian presence and the broader Palestinian community in Jerusalem. The most recent ones include:

1. The Case of “Al-Hamra” Silwan, East Jerusalem

In early 2023, Israeli settlers in East Jerusalem, accompanied by Israeli police, forcibly evicted a Palestinian family from the land they have leased from the Greek Orthodox Church since the early 1900s.¹⁶ The property, about 1.2 acres, is located just outside the walls of Jerusalem’s Old City, beneath the Al Aqsa Mosque and immediately adjacent to the Pool of Siloam which, it turns out, is currently ground zero for the State of Israel’s work to extend the reach of the City of David National Park.¹⁷

The Greek Orthodox Patriarchate condemned this takeover as an “illegal act,” highlighting how Israeli courts had voided the family's lease under pressure from settler groups. The dispossession was followed in January 2023 by Israeli forces bulldozing structures on the seized land to erase evidence of Palestinian tenure, with the Israeli Antiquities Authority continuing throughout 2024 to conduct excavations in Al-Hamra, using archaeology as a pretext to consolidate settler control over the area, notably for organizations like Ateret Cohanim, an extremist Jewish organization with the objective of establishing a permanent Jewish presence in the old city of Jerusalem and its surrounding Palestinian neighborhoods. This plot lies adjacent to the Old City and was leased for a nominal sum, sparking outrage when revealed in 2008. Legal action by the Patriarchate to void the deal was rejected by Israel’s Central Court in 2022 on procedural grounds, citing that the statute of limitations for such suits had expired after 15 years, despite the sale remaining concealed for nearly that duration. The result was effective forfeiture of the estate to settler control, and the eviction of longtime Palestinian tenants from the property.

The “Al-Hamra” case represents a deliberate pattern of dispossession targeting the Christian institutions and communities in Jerusalem. The illegal confiscation of Greek Orthodox Patriarchate land, first through alleged secretive sales to settler groups, then through the violent 2022 eviction of the Sumrein family under police escort, and finally through the ongoing archaeological erasure of Palestinian Christian heritage demonstrates a coordinated strategy to eliminate Christian presence in the city. This constitutes not merely

¹⁶ Mondoweiss: “Accompanied by police, Israeli settlers seize East Jerusalem land owned by Greek Orthodox Church”, 3 January 2023, [Accompanied by police, Israeli settlers seize East Jerusalem land owned by Greek Orthodox Church – Mondoweiss](#)

¹⁷ *Ibid*

property take-over but an assault on church lands being systematically transferred to extremist settler organizations under judicial and state protection.¹⁸

2. The Armenian Quarter

The Armenian centuries' old, historic presence in occupied Jerusalem is still facing significant threats due to Israeli measures. The Cow's Garden, a section of Jerusalem's Armenian Quarter, is an area made up in large part of a car park. The land, which makes up some 25% of the Armenian Quarter in Jerusalem, became a point of a dispute after the Armenian church of Jerusalem leased the Cow's Garden and some other parts of the Armenian Quarter to XANA Capital, a settler group-affiliated company owned by an Australian-Israeli investor, despite having been in their ownership for nearly a century. Following complaints from the local Armenian community, the Armenian Patriarchate of Jerusalem attempted to reverse the lease. The church released a [statement](#) announcing the "cancellation" of the agreement to lease the Cow's Garden, though the effects this has on the signed lease are not clear. Soon after the statement, bulldozers allegedly hired by XANA Capital moved in and began demolishing parts of the land. The proposed development would also take up the community hall, the patriarch's garden, the seminary and five family houses. Currently, the legal case of the Armenian community is still ongoing before the Jerusalem District Court, and the next hearing is scheduled in October 2025.¹⁹

Besides the ongoing court case of the Cow's Garden, In February 2025, the Jerusalem Municipality alleged the Armenian Patriarchate owed tax debt dating back to 1994, claiming the debt was massive though never judicially proven. **As such, a foreclosure order was issued, threatening to seize and auction Patriarchate properties.** The Patriarchate filed an administrative petition, securing a temporary halt, with a key court hearing scheduled for February 24, 2025. As a result of public pressure, the hearing was postponed, but the threat of auction remains present if the petition is dismissed or rejected.

Moreover, the Armenian Quarter was subject to tens of Jewish extremist settlers' attacks: around 32 attacks took place inside the Armenian Patriarchate and/or its surroundings. These incidents included spitting, verbal abuse, threats, vandalism, and even physical aggression towards clergy and pilgrims during religious ceremonies and national commemorations. One such incident occurred on 13 April 2025, when an Israeli settler spat towards the Armenian Patriarchate gate and stated: "One day we will burn all of you," reflecting the rising impunity and ideological hatred behind these attacks. In November 2023, several Israeli settlers armed with assault rifles entered the Cow's Garden. Two of the men held barking dogs on leashes as others confronted Armenian Christians who had gathered to prevent access to earthmoving machinery that had recently demolished a wall and torn up asphalt on the land.

¹⁸ [Jerusalem Compass](#) reported that the Israeli Central Court rejected the Patriarchate's lawsuit in the 2004 "Al-Hamra" case in Silwan, ruling it legally time-barred, June 2022.

¹⁹ Statement by the Armenian Community, Save the Arq: "Legal Update Community Cow's Garden Case No 38428-02-24 (29 June 2025).

c. Restrictions on Access to Places of Worship & Easter Celebrations

Over the past 2 years, the Israeli government increased the already existing restrictions on the Palestinian freedom of worship and introduced additional restrictions on the Christian “Holy Fire” Easter celebration. Israel has intensified restrictions on Easter celebrations in Jerusalem, which include a **significant decrease by 80% on the number of celebrants allowed in the Holy Sepulcher Church for Holy Fire Saturday**, strict limitation of access to surrounding areas of the Church, and preventing the access of celebrants within the surroundings of the Church.

Access for Palestinian Christian worshippers to Jerusalem remains largely hindered and challenging. For the second year since 2023, Israel further tightened the permit systems. Prior to 7 October 2023, the Clergy submits lists of parishioners to request for month-long entry permits to Jerusalem; as of 2023, Israel now opts to the use of their “Al-Munaseq” mobile application that requires Palestinians, including Palestinian Christians to manually and individually Easter permits through this invasive application, replacing the traditional Church-mediated process. **Many of those who were able to receive permits were turned away at checkpoints**, and denied access to the Church of the Holy Sepulcher. In Easter of 2025, the same restrictions were applied, denying permits to access the Church of Holy Sepulcher.

As for the celebrants who attended the Easter Ceremonies in April 2025, **Israeli police refused to allow church members to deliver the lit torches of the ‘Holy Fire’ to congregations in Gaza and Bethlehem, breaking hundreds of years of precedent.**²⁰ Worshippers endured prolonged periods of congestion and harassment at the New Gate prior to gaining entry. Beyond the New Gate, worshipers encountered three subsequent checkpoints where they were subjected to aggressive treatment by Israeli security forces and police,²¹ and **as is documented every year, Israeli forces physically assaulted celebrants who gathered in the area**, which discouraged more Christian families from taking part in Holy Week Celebrations.

d. Increased Hate Crimes Against Christians

Over the past 2 years, hate crimes against Christians in Jerusalem have increased and become more violent and common. There were approximately **70 documented incidents of anti-Christian harassment between April and June 2025 alone.**²² In 2024, 111 cases of attacks against Christians were documented,²³ all of them by Jews. The RFDC notes that close to 90% of the documented incidents would not have been reported at all without the intervention of their volunteer hotline network, as victims frequently refrain from filing police complaints due to fear,

²⁰ Jerusalem Story: “A Bitter Easter Passes, a Marker for Increasing Repression”, (April 25, 2025), available at: <https://www.jerusalemstory.com/en/article/bitter-easter-passes-marker-increasing-repression>

²¹ Ibid.

²² RFDC: “Second quarter 2025 data on harassment of Christians in Israel - From the Religious Freedom Data Center”, July 2025, available at: <https://drive.google.com/file/d/1oKpIhVRLpa5bo-GKcS6bQOS-pAoJYMR/view>

²³ Documentation of The Rossing Center for Education and Dialogue: <https://rossingcenter.org/>

distrust, or futility. Even when filed, the Israeli police rarely followed through: only 2 out of 22 complaints submitted in the first half of 2025 were referred to prosecution. On 26 May 2025, Jerusalem Day saw a surge of settler attacks: **at least 9 separate spitting or harassment incidents targeted Armenian clergy and institutions in a single day.**

Hate crimes against Christians include spitting, verbal abuse, physical assaults, vandalism, desecration, arson of Christian property, and property seizure. The harassment and hateful discourse against the Palestinian Christian communities in Jerusalem have seen an uptick fuelled by the current far-right Israeli government and overall impunity with which attacks against Palestinian Christians are carried out. The Christian community in Jerusalem already faces serious risks to its continued existence and push factors such as their discriminatory status as “permanent residents”, family unification, work and residence permits, discriminatory planning and services, and home demolitions.

Notably, the Armenian Christian community has endured repeated attacks, including armed settler violence against clergy in November 2023 and April 2024, with no evident accountability. In the Armenian Quarter, vandals spray-painted “Death to Arabs, Christians and Armenians,” on the walls. At the Church of the Flagellation, a settler attacked a statue of Jesus with a hammer.²⁴ Church leaders from all denominations repeatedly denounce such attacks, and note a serious rise in them with little to no official Israeli action to hold the perpetrators accountable.

3. In the Occupied West Bank

The upscaling of the Israeli annexation policies in the West Bank since the events of 7 October 2023 has been significantly undermining fundamental rights of Palestinians, deteriorating in an extreme and volatile human rights situation. Although their impacts are felt by all Palestinians, **the entrenchment of Israel’s human rights violations in the occupied West Bank are especially acute for the last remaining Palestinian Christian communities, as they directly influence their declining numbers.** The remaining Palestinians are not only uprooted by direct force but driven out by volatile living conditions exacerbated by occupation and annexation.

The drastic shrinking of Christian presence in the West Bank is further exacerbated by continuous settlement expansion, land confiscation, settler violence as a tool of forcible transfer, severe movement restrictions, home demolitions, and economic decline and de-development, seeking to fragment, isolate, and depopulate Palestinian communities in Areas B and C.²⁵ Some major alarming developments include:

²⁴ *Ibid*

²⁵ UN OCHA: “Humanitarian Situation Update #222, #244, #252, #256,”

a. Settler Violence as a Tool of Forcible Displacement & Erasure of Palestinian Christian Heritage

1. Case of Taybeh Village - Ramallah

The village of Taybeh, one of the last remaining Christian communities in the West Bank, exemplifies how settler violence and state policies converge to erase Palestinian Christian presence. On 13 July 2025, Settlers, often accompanied by Israeli forces, repeatedly attacked Taybeh's residents and properties, including the Greek Orthodox Church of Saint George and local homes.²⁶ Settlers have also set fire near the historic cemetery and Church of St. George. On July 24, 2025, Israeli settlers continued their violent attacks against the Palestinian Christian village of Taybeh. They recently seized control of a nearby natural water spring, destroying water-pumping equipment and disrupting the water supply to villages like Taybeh, according to the Palestinian water company.²⁷ On July 28, 2025, the settler attacked a Palestinian Christian family, setting their vehicles ablaze and spray-painted hate speech across the neighborhood walls.²⁸

2. Case of Al Makhroun Valley - Bethlehem

Al-Makhroun Valley, located in Beit Jala, Northwest of Bethlehem, is almost entirely owned by Palestinian Christian families (up to 91%)²⁹ and is deeply tied to Palestinian Christian heritage in the Bethlehem Governorate. The Valley is part of a UNESCO World Heritage Site Under Danger, and Bethlehem's last remaining green and open space area, currently under the imminent threat of Israeli annexation.

Since the outset of Israel's occupation in 1967, Israel started building settlements surrounding the area, today known as the Gush Etzion settlement 'bloc'. However, in 2019, a settlement was planted in the heart of the valley, after the destruction of a home and restaurant of a Palestinian Christian family, and initial seizure of Palestinian agricultural land in Al-Makhroun by settlers, who leveled plots and erected fences and mobile homes without legal ownership.³⁰

In July 2024, the Kisiya family, the Palestinian Christian family with was forcibly evicted by Israeli settlers backed by the Israeli Civil Administration, amid military protection³¹. Although the family could return to their land in 2025, their case in ongoing in Israeli courts. The broader context

²⁶ Balasan Initiative for Human Rights, Update: Settler Violence as a Tool of Erasing Palestinian Christian Heritage in the West Bank (The Case of Taybeh), <https://balasan.org/update-settler-violence-as-a-tool-of-erasing-palestinian-christian-heritage-in-the-west-bank-the-case-of-taybeh/>

²⁷ NPR: "A Wave of Israeli Settler Attacks Reaches a Christian village in the West Bank", 24 July, 2025, <https://www.npr.org/2025/07/24/nx-s1-5476663/a-wave-of-israeli-settler-attacks-reaches-a-christian-village-in-the-west-bank3/>

²⁸ See Wafa: "Colonist attack Ramallah-area town, burn two vehicles", 28 July 2025, <https://english.wafa.ps/Pages/Details/159649>

²⁹ The Balasan Initiative for Human Rights: "Annexing the Land of Grapes and Vines: Case Study of Al Makhroun Valley", 2020, available at: <https://balasan.org/annexing-the-land-of-grapes-and-vines-case-study-of-al-makhroun-valley/>

³⁰ Palestinian Centre for Human Rights & IMEMC, "Israeli settlers seized agricultural land in al-Makhroun area, planting mobile homes", <https://pchr.org/weekly-report-on-israeli-human-rights-violations-in-the-occupied-palestinian-territory-23-29-may-2019>

³¹ Balasan Initiative for Human Rights, "Urgent: Israeli settlers forcefully evict Palestinians from their lands in Al-Makhroun", 1 August 2024, available at: <https://balasan.org/urgent-israeli-settlers-forcefully-evict-palestinians-from-their-lands-in-al-makhroun-the-last-green-area-left-in-bethlehem-and-a-unesco-world-heritage-site/>

in the area reflects Israeli annexation interests endorsed by Finance Minister Bezalel Smotrich; In 2024, Israel designated a jurisdictional area for the establishment of a new settlement named ‘Nahal Heletz’ adjacent to Battir, threatening to sever territorial continuity and disrupt access to water springs, terraces, and farmland that have sustained local residents for generations. The planned settlement undermines the commitment to preserve its cultural and ecological heritage.³².

Such expansion efforts are accompanied with rising settler violence, settlement expansion, and infrastructural encroachment into rural Palestinian lands after 7 October 2023, exacerbating displacement across the Bethlehem countryside. Israeli policies in the area directly threaten the integrity of the UNESCO Heritage Site, undermine Palestinian Christian presence in the Governorate, and violently erode the ecological, social, and economic lifeblood of Palestinian communities in Al-Makhroun.

3. Case of the Monastery of St. Gerasimos - Jericho

On 7 August 2025, **Israeli settlers encroached upon the grounds of the historic Orthodox Monastery of St. Gerasimos of the Jerusalem Patriarchate (Deir Hajla) in Jericho which dates back to the fifth century, marking another escalation in the targeting of Christian holy sites.** According to eyewitness accounts published by the Union of Orthodox Journalists (UOJ), the settlers attempted to assert control over the monastery’s agricultural land.³³ The monastery now faces the theft of its monastic land by settlers adhering to Kahanism, whose main political movement Kach Kahane Chai are designated as Jewish terrorist movement. In recent years, **the surrounding area has witnessed the establishment of more than five new settlements, displacing local Palestinian families, with settlers openly declaring that “Christian idolatry” must be uprooted from the land.**³⁴ This form violence directly and violently erodes the Palestinian Christian population and identity, as again, it creates a coercive environment constitutes indirect forcible transfer. This instance prompted immediate condemnation from the Greek government, which convened an emergency diplomatic meeting in response. This incident aligns with a documented pattern of rising settler attacks on Christian religious sites in the West Bank post-October 7, 2023.³⁵

³² See UN OCHA-oPt, “Recent developments add to pressure on Bethlehem’s rural area”, May 2009, <https://www.ochaopt.org/content/recent-developments-add-pressure-bethlehem-s-rural-area>

³³ Union of Orthodox Journalists, “Israeli settlers attack Orthodox monastery in Jericho”, 7 August 2025, <https://spzh.eu/en/news/87596-israeli-settlers-attack-orthodox-monastery-in-jericho/>.

³⁴ Union of Orthodox Journalists, “Israeli Settlers Attack Orthodox Monastery of St. Gerasimos,” August 2025; Instagram post by @arab.christian, August 2025, <https://www.instagram.com/p/DNGjxrCp88r/>.

³⁵ See the full report of World Council of Churches, “Escalating Threats to Christian Heritage in the Holy Land (2024)”, <https://www.oikoumene.org/resources/documents/wcc-report-on-christian-heritage-in-the-holy-land-2024/>.

b. Suffocation of Palestinian Towns & Villages with a Christian Population in the West Bank

1. Bethlehem³⁶

Israeli policies of annexation are intensified in the Bethlehem governorate, where the majority of Palestinian Christians in the West Bank are concentrated, given its strategic proximity to Jerusalem, coupled with an Israeli ideology that perceives it as part of ‘Greater Jerusalem’. As such, Israel has accelerated its annexation policies in Bethlehem, resulting in severe restrictions on movement, economic strangulation and de-development, settlement expansion, land confiscation, and increasing settler violence.

Bethlehem governorate stretches from the Green Line all the way to the Dead Sea, and is a prime example to illustrate the obstacles to development and challenges faced by Palestinians so far mentioned by this report. Bethlehem is one of the areas of Palestine with the highest concentrations of Christians, especially in Bethlehem city, Beit Jala and Beit Sahour, where Palestinian Christian communities largely rely on tourism, or operate small artisanal craft stores, often hoping to sell their wares to visitors to the Nativity Church and other Christian sites in the surrounding areas. As such, the case of Bethlehem allows a deeper look at the challenges facing Palestinian Christians, to see how obstacles to their economic, social and cultural self-actualization can lead to increased levels of emigration among this increasingly isolated community, creating knock-on effects on the Palestinian Christian community’s presence in Palestine as a whole.

With regard to Bethlehem’s geographic make-up, more than 85% of Bethlehem governorate is made up of Area C, with only 1% zoned for Palestinian development. Of the rest of the land located there in Area C, 38% is designated as “firing zones”, 34% as nature reserves, and 12% as settlements until 2023. The part of Bethlehem adjacent to the Dead Sea is closed for exploitation for tourism, mining or other activities. Furthermore, 52km of the Annexation Wall runs through Bethlehem, designating a large area of Bethlehem as forming part of the Seam Zone. Among Bethlehem’s population, it has the second largest number of inhabitants living in Area C in the West Bank, following Hebron. The economic and social difficulties faced by inhabitants of Area C are experienced by those in Bethlehem, as elsewhere. It is perhaps due, in part, to Bethlehem’s large population in Area C that it is the governorate with the highest levels of unemployment in Palestine.

With regard to property rights, the Palestinian Central Bureau of Statistics noted that in 2022, Bethlehem accounted for 18% of all demolition orders. The construction of the Annexation wall cut off many Christian farming families from their land, leading to serious difficulties in its continued cultivation. Estimates place the amount of land annexed in Bethlehem as a result of the Wall’s construction at approximately 22,000 dunams. “Permits” issued by the Israeli military,

³⁶ The Balasan Initiative for Human Rights: “Israeli Policies of Impoverishment & De-Development in the Occupied Palestinian Territory: Impacts on Youth Emigration Case Study of Bethlehem”, 2023, available at: <https://balasan.org/new-report-israeli-policies-of-impoverishment-de-development-in-the-opt/>

when granted, only allow limited access to farmers for periods far shorter than what is necessary to maintain their crops, and they frequently face harassment, and at times violence when crossing Israeli checkpoints. In addition, the settlements of Gush Etzion, Har Homa and Gilo, comprising some 95,000 settlers⁷⁹, are all located in close proximity to farmers' agricultural areas, and farmers often see violence and damage to their crops as a result of settler attacks.

The Annexation Wall not only cut off Palestinian Christian farmers from their land, but it also blocked the main road between Bethlehem and Jerusalem, severing their connection with their holy sites and the much larger Christian communities in Jerusalem, resulting in their community's isolation. The Wall's construction also affected and threatened the functioning of the Cremisan Monastery and Convent, along with destroying some of its adjacent agricultural lands. Important heritage and pilgrimage sites for Christians in Bethlehem, such as the Nativity Church and Shepherd's field, receive significantly fewer visitors than similar sites in Jerusalem, which is only 8 km away, due to the climate of fear and insecurity that Israeli authorities create to discourage tourism to the West Bank. For the tourists that do actually visit sites in the occupied West Bank, most do not stay overnight, and travel with Israeli tour guides who push a harmful narrative of Palestine, often underplaying the existence and relevance of Palestinian Christians.

Moreover, these tour guides often steer visitors away from small artisanal shops selling religious iconography and crafts, harming the livelihoods of Palestinian Christians who rely on their custom. Taken as a whole, when considering the strangled economy that Palestinian Christians in Bethlehem are born into, the high rates of unemployment they face, the continued destruction, confiscation and annexation of their means of subsistence, their increasing community isolation, and the likelihood of worsening circumstances in the future, it becomes apparent as to why many Palestinian Christians consider that they have no hopes for life in freedom, dignity and development in their homeland, and may seek to emigrate. Sadly, given its small, and shrinking, size, the Palestinian Christian community is facing an existential threat as a result.

As with the rest of the West Bank, the impact of the escalation post 7 October 2023 was heavily witnessed in Bethlehem. Israel's heavy militarization of the West Bank has had profound ripple effects across Bethlehem, namely in terms of suffocating movement, settlement expansion and economic strangulation. **Bethlehem has the highest number of Israeli movement blocks; since 7 October 2023, Israeli forces implemented 47 new military gates and 30 cement blockades cutting off major agricultural roads, in addition to expanding the Annexation Wall by 17 km within the governorate.**³⁷ These measures isolated key Christian villages like Al-Makhroun and Al-Khader from their farmland during critical seasons, disrupting olive harvests; a season central to Palestinian Christian cultural and economic life. As the update concludes, this fragmentation

³⁷ See Balasan Initiative for Human Rights, "Further Fragmented Reality: The Impacts of the War on Gaza on the Bethlehem Governorate", 14 March 2025, <https://balasan.org/further-fragmented-reality-the-effects-of-the-war-on-gaza-on-the-bethlehem-governorate/>.

has further destabilized Christian communities that rely on land-based livelihoods, exacerbating the waves of emigration and erosion of heritage in Bethlehem.

The Western parts of the Governorate, Al Makhroun and Cremisan Valleys, Both parts of a UNESCO world heritage site, vital areas for Palestinian development, ecological systems, natural resources and largely connected to the Palestinian Christian heritage are under the threat of Israeli annexation³⁸.

The Eastern parts of Bethlehem are under equal threats; the Israeli army issued two military orders in 2024 that effectively annex 167,000 dunams of lands of the Eastern part of the Bethlehem Governorate, classified as Area (B), and “Contractual / Agreed-Upon Reserves”, constituting around 3% of the West Bank.³⁹ Combined with adjacent areas that Israel has designated as “firing Zones”, Israel has entrenched its *de facto* annexation from Bethlehem all the way to the Dead Sea. The first order effectively alters the enforcement authority in the “Agreed-Upon Reserves” from the PA to the Israeli army, while the other order prohibits Palestinian building and construction in the designated “Agreed-Upon Reserves”, and considers all buildings built after the Wye Agreement (after 1998) as “unlawful”, effectively granting the “Civilian Deputy” of the head of the Civil Administration, the authority to demolish Palestinian structures and homes retroactively for any building that was built after 1998.

The Southern parts of the Governorate witness almost daily instances of excessive settler violence, which has displaced Palestinian families, took over their lands and caused damages to their belongings and livelihoods.⁴⁰

Bethlehem, home to one of the oldest Christian denominations in the world, has now endured its second consecutive Easter season without pilgrims or tourists since October 2023. The inability to move freely between Jerusalem and the oPt, Palestinian Christians are unable to reach the history and religious sites of Bethlehem during their holidays. In addition, tourism, the economic lifeline of Bethlehem, has collapsed with local shopkeepers and hotel owners reporting unprecedented closures and losses, this collapse has amplified unemployment and forced many families (already under the pressure from the occupation) to seek livelihoods abroad.⁴¹

³⁸ The Balasan Initiative for Human Rights: “Annexing the Land of Grapes and Vines: Case Study of Al Makhroun Valley”, 2020, available at: <https://balasan.org/annexing-the-land-of-grapes-and-vines-case-study-of-al-makhroun-valley/>

³⁹ Balasan Initiative for Human Rights: “Alarming: New Israeli Military Orders Effectively Annex Vast Areas of East Bethlehem, Composing 3% of the West Bank”, August 2024, available at: <https://balasan.org/alarming-new-israeli-military-orders-effectively-annex-vast-areas-of-east-bethlehemcomposing-3-of-the-west-bank/>

⁴⁰ See for example The Balasan Initiative for Human Rights: “Escalating Settler Violence in the West Bank: Lands Bulldozed in Khillet al-Qutn, South of Bethlehem”, April 2025, available at: <https://balasan.org/escalating-settler-violence-in-the-west-bank-lands-bulldozed-in-khillet-al-qutn-south-of-bethlehem/>

⁴¹ Le Monde, “Bethlehem experiences second Easter without tourists as fighting in Gaza continues”, 20 April 2025, https://www.lemonde.fr/en/international/article/2025/04/20/bethlehem-experiences-second-easter-without-tourists-as-fighting-in-gaza_6740442_4.html/.

This economic and geographic isolation, in a broader context of prolonged military occupation and colonization, has contributed to a pronounced wave of emigration among Palestinian Christians, notably post 7 October 2023.

The cumulative impact of these pressures reflects a deliberate policy that is reshaping the demographic reality of Bethlehem and other Christian-populated towns, pushing them toward irreversible decline. As businesses shutter, young people emigrate, and communities lose access to their lands and livelihoods, the Christian presence in the birthplace of Christianity itself is being pushed to the brink.⁴²

2. Aboud

Aboud is a historic Palestinian village northwest of Ramallah, with one of the West Bank's oldest and continuously inhabited Christian communities. Its Christian heritage includes ancient 8 historic churches, 1 monastery and archaeological sites dating back to the Byzantine era, including Saint Barbara's church. The 6th century Byzantine shrine of Saint Barbara was dynamited by Israeli forces on 21 May 2022 before being reconstructed.⁴³ **Over the past decades, Aboud has faced increasing geographic, demographic, and economic suffocation under Israeli occupation policies, threatening both its viability and its Christian presence.** Of its original 14,000 dunums, only 2,462 dunums remain under partial Palestinian control (Area B), while 12,000 dunums are under full Israeli control (Area C).⁴⁴

Aboud is surrounded by Israeli settlements, and their infrastructure and bypass roads, with large tracts of village land seized for settlement expansion, military zones, and settler-only infrastructure. The settlements of Beit Aryeh (1981) and Ofarim (1988), housing 5,000 settlers, occupy village lands, while the annexation wall has confiscated 30% of Aboud's agricultural territory.⁴⁵ Israeli military checkpoints and roadblocks restrict access to nearby towns and markets, while the Annexation Wall plan threatens to further isolate the village. These measures limit residents' freedom of movement, obstruct access to agricultural lands (a primary source of livelihood), and impede access to essential services.

Christians in Aboud face particular harm due to the village's small size and its reliance on religious tourism to maintain community life. The annual Feast of Saint Barbara (17 December), featuring the traditional "burbara" dish, highlights this religious heritage, yet Israeli's tourism monopoly prevents most pilgrims from visiting.⁴⁶ **Restrictions undermine church activities, pilgrimage access, and cultural heritage preservation. Land confiscations and settler violence, often including vandalism of religious sites, further erode the Christian community's sense of**

⁴² Zuluf, "What happened to Christians in Bethlehem 2025," 2025. <https://zuluf.com/blogs/news/happened-christians-bethlehem-2025>

⁴³ NAD, "Aboud Village: The Denied Potential of Palestinian Heritage", December 2018, available at: <https://www.nad.ps/sites/default/files/12162018.pdf>

⁴⁴ *Ibid*, NAD.

⁴⁵ *Ibid*, NAD.

⁴⁶ *Ibid*, NAD.

security. The lack of building permits in Area C portions of the village has prevented population growth and pushed younger generations to emigrate, leading to demographic decline. With only 2,200 residents (2017 census), **this pressure threatens one of Palestine’s most ancient Christian communities,**⁴⁷ notably post 7 October 2023 as Israel has intensified all of its policies of annexation and forcible transfer in the occupied West Bank.

c. Judaization of the Archaeological Sites

The Case of Mount Herodium

In recent years, the site has been subjected to intensified Israeli control and rebranding efforts that use archaeology to serve political aims. Mount Herodium is a classic example of how Israel has not only been seeking to exert full authority over archeological sites in the West Bank but also strategically exploiting such authority to claim ownership of the lands surrounding the sites. Mount Herodium is an archaeological site, located in the Bethlehem Governorate, built 2,000 years ago. It is associated with the Roman King Herod. It served as a military base and a winter residence for the king’s wife.

As the most prominent surviving structure from the time of Jesus, the Temple Mount, along with other sites and artifacts from that era, drew significant attention from early explorers. Israel’s approach of intertwining political ambitions with a focus on specific historical periods falls in line with early Zionist efforts. For them, the Herodian period was not associated with Jesus’s ministry and crucifixion but provided a tangible context for the late Second Temple period, which was seen as one of the most significant religious-political eras in Jewish history. While Israeli authorities describe excavations at Herodium as historical conservation, the broader pattern reveals a strategy of archaeological colonization. These excavations often proceed without the consent or involvement of local Palestinian communities and disregard the area’s cultural, religious, and agricultural significance to the indigenous population. As the BIHR has documented, Israeli authorities continue to excavate, develop, and incorporate the Herodium site into a wider network of Jewish-only settlements, particularly the nearby Nokdim settlement, effectively severing Palestinian access to and claims over the site.⁴⁸

These actions form part of a broader pattern in which Israel uses “heritage” and “archaeological preservation” as instruments to expand settlement control and to erase the Palestinian Christian and Muslim cultural imprint from key areas of historical and religious significance.

d. Denial of Religious Rights for Palestinian Christian Political Prisoners

Since 7 October 2023, Palestinian prisoners in Israeli detention have faced increasingly systemic violations and inhumane treatment, torture and tens of documented cases of death.

⁴⁷ *Ibid*, NAD.

⁴⁸ See Balasan Initiative for Human Rights, *Judaization of Bethlehem: Archaeology in Service of Annexation “The Case of Mount Herodium”*, 24 June 2024, <https://balasan.org/judaization-of-bethlehem-archaeology-in-service-of-annexation-the-case-of-mount-herodium/>

Notwithstanding the arbitrary nature of Israel's military court with a 99% conviction rate, the lack of due process and the illegality of administrative detention and transferring Palestinian prisoners to areas inside the Green Line, out of the 11,000 Palestinians prisoners,⁴⁹ only a small number of Christian detainees are held in Israeli prisons. However, their treatment reflects deliberate religious discrimination. **These violations include denial of access to sacred texts such as the Bible, obstruction of religious observance during major holidays like Easter and Christmas, and the timing of arrests to deliberately coincide with such occasions.** These practices appear designed to sever detainees from their faith traditions and communal identity.

Currently documented Christian detainees include:

- Three sentenced prisoners
- Two held under administrative detention without charge
- Three held in pre-trial detention
- Four detainees with ongoing trial proceedings

In multiple documented cases, Palestinian Christian detainees have reported being denied access to religious materials, like the Holy Bible, and being isolated during periods of religious significance. Families of detainees have repeatedly testified that arrests are timed intentionally to deprive them of participation in major Christian observances. **This denial of access to religious practice is further compounded by reports of verbal humiliation related to prisoners' faith, degrading treatment, and denial of contact with religious representatives.**⁵⁰

Israel's consistent obstruction of these rights for Palestinian Christian detainees reflects a broader pattern of religious discrimination and suppression. In the context of prolonged administrative detention and routine medical neglect, the additional targeting of Christian prisoners' religious identity represents a grave violation that undermines their dignity, faith, and cultural belonging.

4. Inside the Green Line

Prior to the Nakba of 1948, the Galilee region was home to a dense and thriving Christian presence. The ethnic cleansing that followed the Nakba displaced approx. 35 % of all Palestinian Christians resident in the British Mandate of Palestine, who became refugees⁵¹, and their villages were depopulated. Today, the remaining Palestinian Christians inside the Green Line are estimated to be roughly 130,000,⁵² holding Israeli citizenship, but continue to face institutional discrimination and existential pressures that threaten their communicable and religious life.

⁴⁹ See the [Palestinian Central Bureau of Statistics](#), 2025

⁵⁰ See Milhildard: "The Prisons of the Occupation: The Long Path of the Detainees' Suffering—When Even the Holy Bible is Forbidden", 15 April 2024, <https://milhildard.org/the-prisons-of-the-occupation-the-long-path-of-the-detainees-sufferingwhen-even-the-holy-bible-is-forbidden/>

⁵¹ Bernard Sabella: COMPARING PALESTINIAN CHRISTIANS ON SOCIETY AND POLITICS: CONTEXT AND RELIGION IN ISRAEL AND PALESTINE, available at: <https://koinonia-jerusalem.org/wp-content/uploads/2023/01/Sabella-Bernard-Comparing-Palestinian-Christians-on-Society-and-Politics.pdf>

⁵² *Ibid.*

The majority of Palestinian Christians, over 70%, reside in the Northern district, particularly in the areas such as Fassuta, Mi'ilya, Jish, and Kafr Yasif, which still maintain a Christian population. Despite this enduring presence, Palestinian Christians have been increasingly targeted and marginalized both as Palestinians and as Christians, despite holding an Israeli citizenship. Some of the Israeli measures targeting Palestinian Christian presence inside the Green Line since BIHR's submission in November 2023 include:

a. Preventing Christian Holiday Celebrations

On 14 August 2025, the Israeli police issued a decision banning the celebration of the Feast of the Transfiguration, citing “security and public safety” concerns, which is celebrated every August 19, (according to the Eastern calendar). The main celebration for this occasion is held at the Church of the Monastery of the Divine Transfiguration on the summit of Mount Tabor.

In a statement to respond to the ban, the Greek Orthodox Archbishop Atallah Hanna warned **against the gravity and danger of this action and its impact on a very significant Christian feast, noting the same Israeli practice also happens on Holy Saturday in Jerusalem, and the underlying targeting of Christian feasts, in a deliberate attempt to undermine them and intimidate believers from reaching the religious sites where these spiritual occasions are held.**⁵³

the statement strongly condemns this as a dangerous and unjustified interference in religious life, comparing it to similar restrictions on Holy Saturday in Jerusalem. It accuses Israeli authorities of targeting Christian feasts, undermining gatherings, and intimidating worshippers. The church called for the decision's cancellation, insisting that safety concerns can be addressed without preventing the celebration.

b. Attacks on Churches Without Accountability

Mar Elias Monastery: In July 2023, the Mar Elias Monastery and Church in Haifa were attacked multiple times by a group of Jewish Israeli settlers who forced their entry into the Monastery, seeking to seize it under the claim that Jewish graves and a tomb are situated within the church. **Although no new attacks recurred since the BIHR's submission in November 2023, the rising anti-Christian hate crimes in Israel and the lack of accountability for the perpetrators of such hate crimes render the possibility of repetition of such attacks highly possible, especially as Israeli settlers have increasingly displayed aggression towards this Monastery and its worshippers.** The lack of accountability caused the attacks against the Monastery to evolve from minor attacks by a small group of settlers, and have escalated into larger and more frequent assaults, culminating in a mass attack on the church with aims to seize it forcefully and entirely. The attacks also included raids, arson attempts, vandalizing, and assaulting Palestinian Christians

⁵³ Atallah Hanna Facebook Account, Statement issued in a post dated 15 August 2025, <https://www.facebook.com/share/19ZzL1CuZp/>

who were present at the Monastery. On 11 August 2023, a video was uploaded online by Haifa activist Wadia Abu Nassar, speaking on behalf of his local church leaders. In his video Wadia Abu Nassar issued a public statement rejecting any negotiations with the aggressors, insisting that such extremists must be deterred and held accountable, and warning that even their presence a hundred meters away constitutes a flashpoint of violence⁵⁴.

The attacks on Mar Elias cannot be discerned as exceptional incidents perpetrated by a few Jewish extremists; rather, they represent an escalation in an already alarming context of Israel's deliberate infringement of any non-Jewish religious rights and its policy to affirm an exclusive Jewish religious and historic narrative over occupied Palestine.

c. Discrimination Against Christian Schools

Palestinian Christian schools inside the Green Line, including institutions serving the Palestinians of 1948, have long faced institutional discrimination in the education sector. **The schools are classified as recognized but unofficial⁵⁵ and are thus excluded from equal state support, despite educating approximately 30,000 students and operating 63 institutions in Galilee, Haifa, Jaffa, and Ramla, with a student body composed of both Christian and Muslims.⁵⁶ These schools are instrumental in preserving Palestinian Christian presence and identity, making the discrimination they face particularly consequential.**

From the Israeli Education Ministry, **Christian schools have witnessed sharp reductions in state funding, often receiving less than 30% of typical public school financing while bodies like ultra-Orthodox Jewish schools receive full state funding.⁵⁷** A decade ago, in 2015, Christian schools across Israel, including those in East Jerusalem, protested cuts from 75% funding to just 29%, illustrating discriminatory budget reallocations that undermine their operational stability.⁵⁸

Compounding this discrimination, in East Jerusalem and West Bank contexts, Israel's licensing regime has been used to shut down or threaten Christian schools. In May 2025, Israeli authorities closed six UNRWA-run schools serving Palestinian refugees and students in East Jerusalem, many part of the same Christian institutions or closely affiliated networks, disrupting education for over 800 students and forcing abrupt mid-day relocations.⁵⁹

⁵⁴ See video in Milhildard, "Christians of Haifa refuse any negotiations with aggressors", August 2023, <https://milhildard.org/christians-of-haifa-refuse-any-negotiations-with-aggressors/>

⁵⁵ Salt of the Earth: "[Christian Schools in the 1948 Territories: Presence, Challenges, and Achievements](#)", 8 July 2025

⁵⁶ Ibid.

⁵⁷ Human Rights Watch: "Discrimination Against Palestinian Arab Children in Israel's Schools", 2001, available at: <https://www.hrw.org/legacy/campaigns/israel/schools/index.htm#:~:text=Palestinian%20Arab%20school%20children%20get,level%20of%20the%20education%20system.>

⁵⁸ Time Magazine: "Christian Schools Accuse Israel of Discrimination as Students Strike", September 2015, available at: <https://time.com/4036257/christian-schools-israel-discrimination/>.

⁵⁹ Associated Press: "Israel closes 6 UN schools for Palestinians in east Jerusalem", (8 May 2025), available at: <https://apnews.com/article/israel-palestinians-jerusalem-unrwa-schools-10e4d242d0c1b0d84ce03945b44f6d31>

III. Legal Standards Violated

There is no doubt that the fundamental rights of Palestinian Christians are violated systematically by Israel, as part of the Palestinian people, irrespective of where they are placed on both sides of the Green Line and in their ancestral land, just for being Palestinians.

1. General Application

Palestinian Christians are present in all of their ancestral land on both sides of the Green Line, with varying demographic but declining nevertheless, with one common factor as part of the Palestinian people: They are systematically deprived from their fundamental rights. Irrespective of their geographic location in historic Palestine, the right to self-determination is denied for all Palestinians. Recognized as an *erga omnes* obligation and as a *jus cogens* norm, the right to self-determination is binding on all States, without derogation, and applies equally to peoples under colonial domination, foreign occupation, and other forms of subjugation. It is enshrined in Articles 1(2) and 55 of the UN Charter and in Article 1(1) of both the International Covenant on Civil and Political Rights (ICCPR) and International Covenant on Economic, Social and Cultural Rights (ICESCR), which affirm that all peoples have the right to freely determine their political status and pursue their economic, social, and cultural development. **Indigenous Palestinian Christian communities are part of the larger Palestinian people whose sovereignty, identity, and governance capacities are being deliberately eroded through Israeli control and fragmentation**, and live under the following frameworks:

a. The West Bank

Israel upholds a brutal military occupation in the West Bank that systematically violates the fundamental rights of Palestinians, while simultaneously taking over their occupied territory and resources, in grave violation of international law, namely international humanitarian law (IHL), international human rights law (IHRL), and international customary law. The West Bank, including East Jerusalem, is recognized as occupied territory under international law, with Israel as the occupying power. Applicable legal Instruments include the Fourth Geneva Convention (1949), the 1907 Hague Regulations, and UN Security Council Resolutions 242 (1967) and 338 (1973), which prohibit the acquisition of territory by force and require withdrawal from occupied areas⁶⁰. The nature of Israel's occupation of the West Bank, the permanence of its control and the entirety of its policies are thus unlawful, which is reaffirmed in the recent International Court of Justice's (ICJ) Advisory Opinion of 19 July 2024 on the "Legal Consequences arising from the Policies and Practices of Israel in the Occupied Palestinian Territory"⁶¹, concluding that Israel's continued presence in the oPt is unlawful, and requiring it to:

- End the occupation "as rapidly as possible";
- Cease all settlement activity;
- Evacuate settlers;

⁶⁰ *Fourth Geneva Convention* (1949), Arts. 47, 49; *Hague Regulations* (1907), Arts. 42–56; UNSC Res. 242 (1967), 338 (1973).

⁶¹ *ICJ, Legal Consequences arising from the Policies and Practices of Israel in the Occupied Palestinian Territory, including East Jerusalem* (Advisory Opinion, 19 July 2024), paras. 252–265, and paras. 132–145

- Repeal discriminatory laws; and
- Provide full reparations, including restitution or compensation.

The ICJ confirmed that the West Bank, East Jerusalem, and Gaza form a single territorial unit and that Israel's prolonged occupation, annexation measures, and demographic engineering violate the prohibition on acquiring territory by force and the Palestinian right to self-determination, in flagrant violations of international law. The ruling reaffirmed that Israel's settlement enterprise violates Article 49 of the Fourth Geneva Convention, while its dual legal systems and spatial segregation breach Article 3 of the International Convention on the Elimination of All Forms of Racial Discrimination (CERD).

The Court found that Israel's annexation practices, resource exploitation, and fragmentation of Palestinian territory constitute clear breaches of the right to self-determination, and that security-based justifications cannot override the prohibition on the acquisition of territory by force.

b. Jerusalem

East Jerusalem remains occupied and illegally annexed territory despite Israel's attempt to 'legalize' its annexation with the 1980 Basic Law: Jerusalem, Capital of Israel. UNSC Resolution 478 (1980) declared the Basic Law "null and void." Israel's application of its domestic law, its deliberate settlement expansion in the area, its demographic alterations including residency revocation policies, demolitions and forced evacuations, and systematic discrimination against Palestinian residents in East Jerusalem, including in status, services and planning policies, stand in flagrant violation of multiple legal standards under IHL, IHRL, as well as the CERD, and customary international law, notably the prohibition on annexation, the violation of the inalienable right to self-determination, and the systematic discrimination and forcible transfer.

c. Gaza

The Gaza Strip, an integral part of the oPt, and it remains occupied despite Israel's claims of withdrawal of its forces and settlements from the Strip in 2005. This was reaffirmed by the ICJ, noting that the criteria to determine Israel's occupation is its effective control over Gaza's airspace, waters, lands and crossings, as well as its population registry.⁶² Israel's blockade imposed on Gaza since 2007 amounts to collective punishment, prohibited under IHL.⁶³ Since 2007, Israel launched recurrent large-scale military operations, with indiscriminate attacks resulting in the killing of tens of thousands of Palestinians, and destruction of civilian infrastructure, which collectively violate key stipulation and rules of IHL and IHRL, and amount to war crimes and crimes against humanity under the Rome Statute.

Since 7 October 2023, Israel has been committing genocide in the Gaza Strip, in violation of the Convention on the Prevention and Punishment of the Crime of Genocide (1948). Genocide, as defined in the Genocide Convention (Art. 2), is any act committed with the intent to destroy, in whole or in part, a national, ethnical, racial, or religious group, such as killing its members, causing serious bodily or mental harm, inflicting destructive living conditions, preventing births, or

⁶² ICJ Advisory opinion (2024), paras. 112–118

⁶³ Article 33 of the Fourth Geneva Convention.

forcibly transferring children. Israel's large-scale killing of Palestinian civilians in Gaza, the indiscriminate attacks against civilians and civilian infrastructure, mass recurrent displacements, mass destruction of homes, hospitals, schools, shelters and vital infrastructure, the deliberate obstruction of humanitarian aid over months and the use of starvation as a method of warfare, resulting in the starvation of Gaza's over 2 million Palestinians, in a context of preceding and recurrent public statements by Israeli officials at the highest political echelons expressing genocidal intent against Palestinians, collectively indicate both the *actus reus* (prohibited acts) and the *dolus specialis* (specific intent) elements required to establish the crime of genocide. The ICJ's 2024 provisional measures in the case brought by South Africa against Israel⁶⁴ under the Convention on the Prevention and Punishment of the Crime of Genocide, found it plausible that Israel's actions in Gaza could fall within the scope of the Genocide Convention, and ordered Israel to prevent acts of genocide and ensure humanitarian access, which was not respected or implemented to this day by Israel.

d. Inside the Green Line "1948 Areas"

Palestinian Nakba survivors who became citizens of Israel face entrenched and systemic discrimination that affects nearly every aspect of public life. The discrimination against them manifests in many areas, including land allocation, housing, education, political participation, and access to public services. This discrimination was codified in the Israeli Nation-State Law of 20278, which possesses a *quasi*-constitutional value, and declares Israel as the nation-state of the Jewish people alone, omitting the right to self-determination and any recognition of equality for non-Jewish citizens. Additionally, planning and zoning laws systematically exclude Palestinian communities from equal development and access to resources, while over 65 laws have been documented as discriminating directly or indirectly against Palestinian citizens. These legal and institutional structures create a regime of racial discrimination and domination, contrary to Israel's obligations under IHRL, the Universal Declaration of Human Rights (UDHD), the ICCPR, ICERD, the ICESCR, among other international human rights instruments that Israel is bound to, as well as the prohibition of racial discrimination in customary international law.

2.Key Legal Violations Undermining Palestinian Christian Presence on Both Sides of the Green Line

In this context, the 'emigration' of Palestinian Christians cannot be perceived be in an elective lens, or as a result of economic hardships or political instability alone. Rather, it is the predictable and documented result of decades-long, sustained Israeli policies that stand in flagrant violation of international law, international humanitarian and human rights law. These policies have created such a coercive environment that, among many other drastic results, undermines the historic Christian presence in its indigenous homeland.

Israel, as the occupying power, bears legal responsibility for the following violations:

⁶⁴ Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (South Africa v. Israel), orders of 16 January 2024 and 24 May 2024.

a. The Deliberate Creation of a Coercive Environment Leading to Coerced Displacement & Transfer

Standard: Under IHL, including the Fourth Geneva Convention, populations in occupied territory are considered “protected persons” and are prohibited from being forcibly transferred or deported, whether within the occupied territory or across borders (Art. 49(1)). Forcible transfer is understood to encompass not only physical expulsion, but also the deliberate creation of coercive living conditions that compel individuals to leave against their genuine will (ICRC Commentary, Art. 49). Additionally, the Rome Statute of the International Criminal Court (1998) defines such acts as:

- A crime against humanity when civilians are displaced without lawful grounds under coercive circumstances (Art. 7(1)(d)).
- A war crime when the occupying power transfers its own civilian population into occupied territory or displaces the protected population from it (Art. 8(2)(a)(vii); Art. 8(2)(b)(viii)).

IHRL, notably the ICCPR and ICESCR, guarantees the right to self-determination, adequate housing, freedom of movement, religious freedom, and protection from discrimination. When an occupying power systematically violates these rights to render life untenable, the resulting displacement constitutes constructive or indirect forcible transfer, prohibited under both IHL and IHRL.

Application: the sharp decline of the Palestinian Christian population on both sides of the Green Line, primarily due the ethnic cleansing and direct forcible displacement resulting from the Nakba, combined with decades of prolonged military occupation, colonization, and systematic discrimination that have continued to threaten their existence in their ancestral homeland increasingly until the present day. As protected persons under occupation, Palestinian Christians’ displacement is driven by deliberate policies of the occupying power, including:

- Denial of self-determination;
- Systematic dispossession of land and resources;
- Severe movement restrictions;
- Discriminatory urban planning, housing bans, and demolitions;
- Economic de-development, particularly in Bethlehem’s tourism sector;
- Restrictions on religious access through permits and physical barriers;
- Broad patterns of systemic discrimination on both sides of the Green Line.

The situation has sharply worsened since 7 October 2023 with the heightened militarization of the West Bank, the genocide in Gaza, and intensified repression across the oPt, accelerating the indirect forcible transfer of Palestinian Christian families, and causing a further decline in the remaining Palestinian Christian population. These measures form part of a demographic engineering policy in East Jerusalem, Area C of the West Bank, and Gaza.

As such, the elements of forcible transfer are met, as follows:

1. Intentional creation of coercive conditions by the occupying power given them being parts of systems, and the prolonged and exclusive nature of Israel's control on both sides of the Green Line;
2. Involuntary departure of protected persons, including across borders;
3. Displacement arising from systematic policies of occupation, colonization, and discrimination;
4. Integration into a broader strategy of demographic alteration.

As such, the coerced emigration of Palestinian Christians is rooted in a deliberately engineered internal coercive environment, rendering it an unlawful forcible transfer under international law.

b. Attacks on Places of Worship and Cultural Heritage

Standard: Customary international law, IHL, IHRL, and the Rome Statute of the International Criminal Court (1998) prohibit deliberate attacks on buildings dedicated to religion, education, art, science, or charitable purposes, and historic monuments. Under IHL, the Fourth Geneva Convention and Additional Protocol I (Arts. 53 and 85) expressly forbid acts of hostility directed against cultural property and places of worship which constitute the cultural or spiritual heritage of peoples. Attacks against such sites are prohibited unless they are being used for military purposes, and any violation constitutes a grave breach.

Under IHRL, the ICCPR (Art. 18) and ICESCR (Art. 15) require states to respect and protect the freedom to manifest religion and to safeguard cultural heritage. The Rome Statute classifies the intentional targeting of buildings dedicated to religion, when not military objectives, as a war crime (Art. 8(2)(b)(ix)) and, when part of a widespread or systematic attack against a civilian population, as a crime against humanity (Art. 7(1)(h) and 7(1)(k)).

Application: As this submission provides, there is a documented pattern of repeated attacks on churches and related religious and cultural heritage sites in the occupied Palestinian territory and inside the Green Line. These include:

- Bombardment of churches in Gaza, including those functioning as civilian shelters;
- Graffiti and vandalism with sectarian or hate-motivated messages;
- Arson attacks and physical assaults on clergy and worshippers;
- Destruction of property integral to the religious and cultural identity of the Palestinian Christian community.

When attacks on churches, particularly those sheltering civilians, cause deaths or injuries, they constitute grave breaches of the Fourth Geneva Convention and serious violations of IHL. The occupying power's failure to prevent, investigate, or prosecute such acts further entrenches impunity, violating its obligations under both IHL and IHRL.

Given the recurring nature, targeting of religious sites, and the impact on protected persons, these acts may meet the Rome Statute thresholds for:

1. War crimes: intentional attacks on buildings dedicated to religion not used for military purposes;
2. Crimes against humanity: when part of a widespread or systematic attack against the civilian population.

Accordingly, the pattern of deliberate or reckless targeting of places of worship and cultural heritage in Palestine engages the international legal responsibility of the occupying power and warrants international investigation and accountability measures.

c. Attempts to Hinder the Churches with Taxation

Standard: Under IHL, as codified in The Hague Regulations of 1907 (Arts. 43 & 46) and the Fourth Geneva Convention, an occupying power must respect existing laws and institutions in occupied territory, including arrangements protecting religious institutions and property. Customary IHL (Rule 38) further protects cultural property and places of worship from interference. IHRL protects freedom of religion (ICCPR Art. 18) and prohibits discrimination in the enjoyment of this right. The *Status Quo* arrangements governing Christian holy sites in Jerusalem, recognized by the UN and respected historically, stand to protect churches from municipal taxation.

Under international law on state succession and occupation, changes to long-standing exemptions for religious institutions must not be imposed unilaterally by an occupying power, especially if such changes would impair religious practice or target a specific community, which could amount to discrimination prohibited by ICCPR (Art. 26).

Application: As provided in this submission, recurrently since 2018, the Jerusalem municipality, with Israeli government backing, sought to impose municipal property taxes on church-owned properties not used strictly for worship, in violation of the decades-long *Status Quo* of Jerusalem, threatening the financial viability of Christian institutions, including those providing education, healthcare, and social services to Palestinians, disproportionately impacting the Palestinian Christian community. Given Israel's status as occupying power in East Jerusalem, such measures:

1. Contravene IHL obligations to respect existing laws and arrangements protecting religious property;
2. Interfere with freedom of religion by impairing churches' ability to maintain worship spaces and community services;
3. Constitute discriminatory treatment if applied in a manner that disproportionately burdens a protected religious minority.

Accordingly, attempts to unilaterally impose municipal taxes on churches in Jerusalem engage Israel's international legal responsibility under both IHL and IHRL, and may form part of a broader pattern of measures undermining the Palestinian Christian presence on both sides of the Green Line.

d. Hate Speech and Incitement

Standard: Under IHRL, States are obligated to prohibit and prevent advocacy of national, racial, or religious hatred that constitutes incitement to discrimination, hostility, or violence.

- ICCPR Article (20.2): Prohibits any advocacy of national, racial, or religious hatred that amounts to incitement to discrimination, hostility, or violence.
- ICCPR Articles (18 & 19): Protect freedom of thought, conscience, and religion, and freedom of expression—while allowing restrictions where necessary to protect the rights of others.
- ICERD (Articles 4 & 5): States must condemn propaganda and organizations promoting racial hatred and to take measures to eradicate such conduct.

States must exercise due diligence to prevent, investigate, and sanction acts of incitement, including when committed by private actors. When state officials engage in, tolerate, or fail to act against incitement, particularly where violence is foreseeable, they stand in breach of their international obligations.

Application: There has been a documented rise in public hate speech and incitement targeting Palestinians, including Palestinian Christians, across political, media, and online platforms. This includes:

- Political rhetoric framing Palestinians in dehumanizing or threatening terms;
- Online campaigns spreading sectarian hostility;
- Public statements by Israeli religious or political leaders encouraging exclusion or violence.

Such discourse has contributed to an environment that facilitates attacks on Palestinian Christians and their institutions. The risk is particularly acute where hate speech is amplified during periods of heightened tension, creating a climate of acceptance and justification for violence.

Where state actors themselves promote, endorse, or fail to condemn such rhetoric—or where enforcement against incitement is absent, selective, or biased, the State fails its duty of prevention under ICCPR and ICERD. This failure is aggravated where the incitement is likely to lead to imminent violence, triggering a heightened obligation to act.

In this context, the absence of effective measures to counter hate speech and incitement against Palestinian Christians constitutes a breach of international legal obligations and contributes to the perpetuation of a climate of hostility and insecurity for this protected community.

e. Restrictions on Manifestation of Religion and on Assembly/Association

Standard: The ICCPR guarantees:

- Article 18: The right to freedom of thought, conscience, and religion, including the freedom to manifest one's religion or belief individually or in community with others through worship, observance, and practice.
- Articles 21 and 22: The rights to peaceful assembly and freedom of association.

Any restrictions on these rights must meet strict criteria:

1. Prescribed by law;
2. Necessary to protect a legitimate aim (public safety, order, health, morals, or the rights of others);
3. Proportionate to that aim;
4. Non-discriminatory in application.

States bear a positive obligation to facilitate religious practice and ensure equal treatment, particularly for religious minorities, and that discriminatory restrictions are incompatible with ICCPR obligations.

Application: In the occupied Palestinian territory and inside the Green Line, Israeli policies and practices significantly restrict Palestinian Christians' ability to manifest their religion and exercise assembly/association rights. These include, among others:

- Permit regimes for access to holy sites in Jerusalem and elsewhere;
- Checkpoints and closures blocking access to churches during major religious events;
- Heavy policing and physical attacks against Palestinian Christian worshippers especially during Easter celebration;

Such measures, especially when only applicable to Palestinian Christians and Muslims, but not Jewish Israelis, are considered discriminatory, violating the principles of necessity and equality under the ICCPR. The yearly assaults and restrictions around Christian holy sites, particularly during Easter, emphasize the unlawfulness of these restrictions and the selective enforcement of 'public order'. By imposing physical, administrative, and policing barriers that unduly hinder Palestinian Christians from accessing places of worship or assembling for religious purposes, the occupying power fails to meet its obligations under ICCPR (Arts. 18, 21, and 22), contributing to a broader pattern of denial of religious freedom and community life for this protected minority.

f. Denial of Religious Rights for Palestinian Christian Political Prisoners

Standard: The right to freedom of thought, conscience, and religion is guaranteed under the ICCPR (Art 18), which applies to all persons, including those in detention. This right includes the freedom to manifest one's religion in worship, observance, practice, and teaching, individually or in community, in public or private. Under the UN Standard Minimum Rules for the Treatment of Prisoners (Nelson Mandela Rules, Rules 65-66), prisoners must be allowed to participate in religious services, possess religious texts, and communicate with spiritual advisers. The Fourth Geneva Convention (Arts. 27, 58, 76) obligates the occupying power to respect religious convictions and practices of protected persons, including detainees. Israel, as a State party to the

ICCPR and bound by customary international humanitarian law, is required to respect and facilitate the religious rights of Palestinian Christian detainees.

Application: As provided in this submission, Israel detains Palestinian Christians prisoners full access to their religious rights. Restrictions include the participation in communal worship, denial of visits from clergy, even during major Christian holidays such as Easter and Christmas, and limitations on access to Bibles and other religious items.

g. **Discrimination Against Palestinian Christian Schools in Israel and East Jerusalem**

Standard: Under IHRL, Israel, as a State party to the ICESCR and the ICCPR, is obligated to guarantee the right to education without discrimination (ICESCR, Art. 13; ICCPR, Art. 26), and to protect cultural rights and the rights of minorities to enjoy their culture, practice their religion, and use their language (ICCPR, Art. 27). The CERD prohibits any distinction based on ethnic, national, or religious identity in the allocation of state resources, including education. As the occupying power in East Jerusalem, Israel is also bound by the Fourth Geneva Convention to maintain public institutions and ensure the welfare of the occupied population, including the provision of education (Arts. 50, 55).

Application: Palestinian Christian schools inside the Green Line, which educate around 30,000 students in 63 institutions across Galilee, Haifa, Jaffa, and Ramla, face systematic budgetary discrimination. Classified as “recognized but unofficial,” they receive less than 30% of public school funding, in stark contrast to full state funding provided to ultra-Orthodox Jewish institutions. The 2015 reduction in state support from 75% to 29% demonstrated an intentional budget reallocation that disproportionately harms Christian institutions, threatening their viability and undermining the cultural and religious identity they safeguard for both Christian and Muslim Palestinian communities.

In East Jerusalem, Israel’s restrictive licensing and closure of educational institutions compounds this discrimination. The May 2025 shutdown of six UNRWA-run schools, many linked to Christian educational networks, disrupted learning for hundreds of students and forced immediate relocation, in violation of the obligation to ensure access to education in occupied territory. These measures collectively constitute a breach of the principles of non-discrimination, minority protection, and the right to education under international law, while also eroding the Palestinian Christian presence and heritage in the region.

Therefore, the BIHR respectfully requests that the esteemed Special Rapporteurs urgently act upon this submission, including by direct communication with the Government of Israel, issue a joint public statement, and take all measures within their mandates including country visits, engagement with relevant UN bodies, and continued monitoring and investigation, exerting pressure within their mandates to prevent further deterioration of the situation and to protect the survival, rights, and cultural heritage of the Palestinian Christian community on both sides of the Green Line.

END.