
NGO Monitor Submission to the Office of the High Commissioner for Human Rights on the Importance of Casualty Recording

NGO Monitor, a project of the Institute for NGO Research,¹ an organization in Special Consultative Status with UN ECOSOC since 2013, presents this submission to the Office of the High Commissioner for Human Rights for the publication of their comprehensive report on the “Importance of casualty recording for the promotion and protection of human rights.” We hope that this submission will aid in the preparation of the report.

The Importance of Accurate Casualty Data

Casualty data is critical for humanitarian aid provision, military operations, and accountability. Bad data can lead to ineffective and counterproductive policy outcomes. Unfortunately, in the Arab-Israeli conflict, Palestinian actors and allies have weaponized the issue of casualty data to promote disinformation and damaging policies. This data manipulation can involve the inflation of casualty statistics, deliberately misidentifying casualties, and providing inaccurate or even false information regarding the manner in which the casualties occurred. In areas tightly controlled by armed groups, terrorist organizations, or authoritarian regimes, such as Iran, Syria, Hezbollah-controlled Lebanon, and Hamas-controlled Gaza, the ability to collect and verify credible casualty information is close to impossible.

Palestinian statistics

Regarding Gaza, casualty statistics come from the Hamas-controlled Ministry of Health as well as several NGOs that are linked to the PFLP terrorist organization. As a result, the number of injured, the nature of their wounds, and the circumstances of their being wounded – are easily manipulated. Yet, this lack of credibility does not seem to prevent diplomats, UN officials, or human rights groups from repeating the unsubstantiated claims.

¹ Members of NGO Monitor’s Advisory Board include Elliott Abrams, Senior Fellow for Middle Eastern Studies at the Council on Foreign Relations; former Canadian Ambassador to Israel, Amb. Vivian Bercovici; Michal Cotler-Wunsh, former member of Knesset for the Blue and White Party; Hon. Michael Danby, MP, senior member of the Australian Labor Party; Harvard Professor Prof. Alan Dershowitz; Canadian Senator, Hon. Linda Frum; best-selling author and commentator and British journalist and international affairs commentator, Tom Gross; Bonnie Glick, former Deputy Administrator and Chief Operating Officer of USAID; Colonel Richard Kemp, former commander of British forces in Iraq and Afghanistan; Douglas Murray, Director of the Centre for Social Cohesion, best-selling author and commentator; former Member of Italian Parliament, Hon. Fiamma Nirenstein, UCLA Professor and President of the Daniel Pearl Foundation, Prof. Judea Pearl; US Jurist and former Legal Advisor to the State Department Judge Abraham Sofaer; Dr. Einat Wilf, former member of Knesset with the Israel Labor Party and advisor to Shimon Peres; Harvard Professor Prof. Ruth Wisse; R. James Woolsey, former US Director of Central Intelligence; and Israeli Supreme Court Justice, Justice Elyakim Rubinstein.

The IDF, as well as NGOs such as the Meir Amit Intelligence and Terrorism Information Center, [NGO Monitor](#), and others, have independently demonstrated that many of the supposed civilians killed throughout the many conflicts between Israel and its neighbors were, in fact, combatants or civilians directly participating in hostilities.

Inter alia, civilians can be deemed to be participating in hostilities if they are performing a military function, such as spotting for other combatants or trying to damage defensive infrastructure in support of an attack. In the Gaza border context, this could mean firing weapons, throwing incendiary devices, planting bombs, storming the border fence, flying fire-bomb kites, or even purposefully acting as a distraction to facilitate others' violence.

In addition, the numbers of dead and injured provides little to no information about the legality of a particular incident. Under international law, the targeting of even one person can be illegal, depending on the circumstances. For instance, a soldier can commit a war crime if they open fire without cause on a single individual.

Yet, this necessary context is often erased from UN reports.

Reliance of Highly Politicized and Terror-Linked NGOs

Almost all reporting produced by OHCHR and Human Rights Council appointed mandate holders have involved extensive, if not exclusive, reliance on claims advanced by a narrow sector of highly politicized and terror-linked NGOs, Hamas, or the PLO. Moreover, NGOs promoting casualty data frequently do not disclose that their own information originates with Hamas or the PLO rather than independent research. Almost none of these claims are verified or independently corroborated before being adopted and given UN endorsement.

During the May 2021 conflict, NGOs falsely classified Palestinian combatants as civilians and ignored evidence that implicated terror groups in the deaths of Gazan civilians. (Approximately 20 percent of the 4,300 missiles fired towards Israel fell short and impacted in Gaza.) NGO Monitor [research has identified 50 incidents](#) in which Hamas and Islamic Jihad operatives killed in Gaza were falsely labeled by NGOs as civilian casualties, or in which civilians killed by Hamas were implicitly attributed to Israel.

UN Office for the Coordination of Humanitarian Affairs' (OCHA-oPt) Manipulation of Casualty Figures

OCHA regularly places sole blame for the continuation of the conflict on Israel, [alleging](#) that the “situation is characterized by a protracted occupation,” “the systematic denial of Palestinian rights,” and a “lack of respect for international law, and a lack of accountability for violations.”

As part of its agenda, OCHA publishes weekly reports on “[Protection of Civilians](#),” monthly “[Humanitarian Bulletins](#),” [fact sheets](#), [case studies](#), and various other publications that promote a narrative based solely on Palestinian victimization and Israeli aggression, while minimizing Palestinian terror, rejectionism, incitement, and legitimate Israeli national security concerns.

These publications often repeat the unverified and unreliable claims of political advocacy NGOs, many of whom are terror-linked, as well as claims by the PLO and Hamas. In turn, OCHA’s repackaging of these claims are subsequently [referenced, cited, and quoted](#) at an extremely high volume by international media and government officials, as well as in official UN documents, including [24 references](#) in the 2022 report of the UN Human Rights Council (HRC)’s “Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and in Israel.”

While OCHA publishes [numerous](#) resources on casualties claims and “Gaza Crossings’ Operations” (including the amount of people and goods allowed into and out of various border crossings), repeating the claims of politicized NGOs, it rarely, if ever, cites relevant Israeli government statistics, such as information published by the [Coordination of Government Activities in the Territories \(COGAT\)](#), [the Israel Defense Forces](#), or the [Israeli Ministry of Foreign Affairs](#).

In addition, OCHA regularly presents data in a manipulative way that erases the context of terrorism and distorts law and morality. For example, OCHA fails to make distinctions between Palestinian civilians and attackers, thereby amplifying Palestinian casualty claims, and drawing a false symmetry between legal Israeli self-defense and illegal attacks by terrorists. In its January 10-30, 2023 [report](#), OCHA presents graphs purporting to show the number of “Palestinian killed by Israeli forces.” Yet, this data as presented does not provide any information as to how the fatalities took place, including how many of the fatalities occurred while Palestinians were attempting to murder Israeli civilians or engaged in violent confrontations with Israeli law enforcement. As a result, it is impossible to make any meaningful assessments from OCHA’s figures.

In addition, there have been cases of attacks by Jewish settlers against Palestinians. While deliberate acts of violence directed against innocent civilians are abhorrent, NGO and UN reporting on violence committed by Israeli citizens in the West Bank is often miscontextualized and politically charged. While multiple NGOs produced materials on violence committed by Israeli civilians in the West Bank, there was a dearth of analysis of key drivers of Palestinian violence in the region, including incitement, financial incentives for terrorist activity, and the recruitment and use of children by terror organizations. Though physical assault, destruction of property, and vandalism are reprehensible, this near exclusive focus on “Israeli settler violence” fails to capture the totality of violence against civilians in the context of the conflict, and highlights the desire of advocacy organizations, UN officials, and certain European diplomats to minimize Palestinian terrorism and their responsibility to combat it. All acts of vigilantism and vandalism are illegal and reprehensible and should be punished to the full extent of the law.

OCHA’s website also highlights a number of biased videos reflecting the Palestinian narrative, including “[How long does it take to demolish a house?](#),” “[Gaza: Only Rubble Where Homes Once Stood](#),” and “[Walled Horizons](#).” These videos show scenes of destruction and despair, while completely omitting Palestinian terrorism, including rocket attacks against Israeli population centers and tunnels running beneath the border into Israel. The videos are devoid of all context and are aimed solely at demonizing Israel.

Recommendations

In light of the significant methodological problems outlined above, NGO Monitor makes the following recommendations:

- Casualty data should be collected from credible and reliable sources and be free of political agenda.
- Engage in an independent and transparent review of the UN casualty reporting process to develop a sound methodology.
- Publish the methodology on the OHCHR website and in each report relying on it.
- Cease reliance on terror-linked actors, including terror-linked NGOs.
- Verify and corroborate NGO claims. Any reliance on NGO claims and reports should be disclosed.
- Ensure reliance on a pluralistic and broad spectrum of civil society in compiling reports.