

# **Blurred Boundaries**

Humanitarian Law and Displacement in the 2024 Lebanon Conflict

8 October 2023 / 27 November 2024

# **Acknowledgement**

ALEF is pleased to express its gratitude to all those who contributed, directly or indirectly, to the production of this report, including the ALEF team, board members, partners and friends.

## **Disclaimer**

While the team made all efforts possible to cross-check information and reproduce facts and events accurately, this does not overrule the possibility of inaccuracies or oversights, for which ALEF hereby expresses its regrets.

# **Table of Contents**

Executive Summary	8
The Conflict	9
1. Legal Definitions Related to the Conflict	10
1.1 Qualification of the Conflict	10
1.2 Applicable Law	13
1.3 Main Actors	13
Israel	13
Hezbollah	14
Lebanese Armed Forces	15
Other Non-State Armed Actors	15
UNIFIL	16
2. War Crimes and Grave Breaches of the Geneva Conventions of 12 August 1949.	17
2.1 Willful killing	17
2.1.1 Introduction	17
2.1.2 Targeting Journalists	18
2.2 Willfully causing great suffering, or serious injury to body or health	20
3. War Crimes and Serious Violations of the Laws and Customs Applicable in Intern	ational
Armed Conflict, Within the Established Framework of International Law	22
3.1 Intentionally directing attacks against the civilian population as such or against	st
individual civilians not taking direct part in hostilities	22
3.1.1 Targeting of Civilians	22
3.1.2 Human shields	25
3.2 Intentionally directing attacks against civilian objects, that is, objects which a	re not
military objectives	28
3.2.1 Legal Framework	28
3.2.2 Hezbollah's Social, Health, and Religious Infrastructure	30
3.2.3 Targeting Al-Qard Al-Hasan	30
3.2.4 Refugee Camps	
3.3 Targeting personnel, installations, material, units or vehicles involved in a hur	manitarian
assistance or peacekeeping mission in accordance with the Charter of the United	ed Nations,
as long as they are entitled to the protection given to civilians or civilian objects	under the
international law of armed conflict	
3.3.1 Legal Framework	33
3.3.2 Attacks on Humanitarian & Medical Personnel & Facilities	34
3.3.3 Attacks on Peacekeepers	35

3.4 Launching an attack in the knowledge that such an attack will cause severe dam	age
to the natural environment which would be clearly excessive in relation to the conc	rete
and direct overall military advantage anticipated and employing weapons, projectiles	and
material and methods of warfare which are of a nature to cause superfluous injury or	
unnecessary suffering	37
3.4.1 Legal Framework	37
3.4.2 Violations during the 2024 War	38
3.5 Targeting buildings dedicated to religion, education, art, science or charitable purpo	ses,
historic monuments, hospitals, and places where the sick and wounded are collecte	
provided they are not military objectives	42
3.5.1 Legal Framework	42
3.5.2 Targeting Facilities Dedicated to Religion	44
3.5.3 Targeting Facilities Dedicated to Education, Art, and Science	
3.5.4 Targeting Historical Monuments	49
3.5.5 Targeting Hospitals and Places Where the Sick and Wounded Are Collected	50
1. Impact on IDPs	53
4.1 Legal Framework for Internally Displaced Persons	53
4.1.1 Definition	53
4.1.2 Legal Protection for IDPs under International Law	54
4.2 Displacement Due to Israeli Airstrikes in 2023-2024	55
4.3 Displacement Due to Hezbollah airstrikes in 2023-2024	56
4.4 Lebanon State Response & Impact	56
4.4.1 Government Response and Challenges	56
4.4.2 - Impact on Education	57
4.4.3 Increase of Rent Prices and Overcrowding	58
4.4.4 Categories of IDPs Affected by the Conflict	59
4.4.5 Rising Internal Tensions and Impact on IDPs	61

# **Executive Summary**

This report, prepared by ALEF – Act for Human Rights (ALEF), examines violations of International Humanitarian Law (IHL) and International Human Rights Law (IHRL) committed during the armed conflict between the State of Israel and Hezbollah<sup>1</sup>. The conflict, which erupted as a regional extension of hostilities following Hamas' October 7th attacks and Israel's retaliation in Gaza, rapidly escalated into a full-scale war involving systematic violations against civilians and civilian infrastructure in Lebanon and northern Israel.

The report is grounded in international legal frameworks, notably the Geneva Conventions and their Additional Protocols, and provides a dual legal qualification of the conflict—an international armed conflict (IAC) between Israel and Lebanon, and a non-international armed conflict (NIAC) between Israel and Hezbollah.

The report reveals grave violations by both parties. Israel is found to have committed serious breaches of IHL, including the willful killing of civilians (journalists, paramedics, peacekeepers), indiscriminate and disproportionate attacks against civilian populations and objects and the use of incendiary weapons resulting in widespread destruction. Furthermore, attacks on humanitarian actors and UN peacekeepers were recorded, raising concerns of war crimes under international law. Hezbollah is also found responsible for violations, particularly through its use of civilian infrastructure, storage of weapons in civilian areas, human shields, and indiscriminate shelling of Israeli civilian populations. These practices are in direct contravention of IHL's fundamental principles of distinction and proportionality.

The report devotes specific attention to the massive internal displacement in Lebanon, estimating 1.4 million displaced persons and highlighting the disproportionate impact on women, children, and vulnerable communities. It further critiques the inadequate response of the Lebanese state to the displacement crisis and the humanitarian fallout of the hostilities.

ALEF urges immediate, independent, and comprehensive investigations into all documented violations and calls on international actors to ensure accountability. This includes the potential activation of international mechanisms, such as commissions of inquiry or ad hoc tribunals, given the absence of jurisdiction by the International Criminal Court. The report concludes that recognizing and addressing these violations is essential not only for justice but also to prevent future impunity and safeguard civilian lives in protracted conflicts.

<sup>1</sup> Non-State Armed Actor based in Lebanon and operating in multiple MENA countries.

### The Conflict

In the wake of Hamas's October 7th attack on Israeli border towns and Israel's large-scale retaliation in Gaza, Hezbollah escalated tensions by opening a 'support front' from Southern Lebanon, first targeting Israeli military positions in the Shebaa Farms and subsequently launching missile attacks on Northern Israeli cities.

In response, Israel launched artillery, and drone strikes at Hezbollah positions near the Blue Line, known to represent a demarcation line drawn by the United Nations in 2000, without being internationally recognized as a formal border. Exchanges between Hezbollah and Israel have gradually expanded, affecting Nabatiyeh, Bekaa, Baalbek-Hermel regions, and other areas, including strikes in Beirut's southern suburb and Northern Israeli cities.

On September 17 and 18, Israel launched simultaneous attacks that could qualify as non-discriminatory and large scale, through detonating thousands of communications devices believed to be used by Hezbollah operatives across Lebanon, resulting in at least 39 deaths and over 3,400 injuries<sup>2</sup>. On September 20 and 23 2024, Israel intensified airstrikes against Hezbollah commanders and fighters, also targeting their Secretary General Hassan Nasrallah on September 27. On October 1, Israel began a military ground invasion of Southern Lebanon, amid ongoing cross-border hostilities, with relentless airstrikes impacting additional regions such as Chouf, Aley, central Beirut, Keserwan-Jbeil, Batroun, Zgharta, Tripoli, and Akkar.

By the time a cease-fire was agreed upon on November 27, 2024, 4,047 people had been killed as a result of Israeli attacks in Lebanon, including 1,106 women and children, and 16,638 others had been injured.<sup>3</sup> The raids have also displaced some 1.4 million people, leading to a severe humanitarian crisis. Israel's death toll stands at over 60,<sup>4</sup> including 28 civilians<sup>5</sup>.

While both Israel and Hezbollah assert that civilians are not being targeted, both parties face accusations of indiscriminate attacks.

<sup>2</sup> Reuters. (2024, October 16). How Israel's bulky pager fooled Hezbollah. Retrieved from https://www.reuters.com/graphics/ISRAEL-PALESTINIANS/HEZBOLLAH-PAGERS/mopawkkwipa/

<sup>3</sup> Republic of Lebanon, Ministry of Public Health. (2024, December 4). 4,047 Martyrs and 16,638 Wounded, the Total Updated Toll of the Israeli Aggression. Retrieved from https://www.moph.gov.lb/en/Media/view/77360/4047--الإحمالية-المحدثة-للعدوان-الإسرائيلي

<sup>4</sup> BBC. (2024, October 31). Seven killed in Israel in deadliest Hezbollah rocket strikes in months. Retrieved from https://www.bbc.com/news/articles/ce8yjr3zyz8o

<sup>5</sup> Washington Post. (2024, October 11). Israeli airstrikes in Lebanon take heavy toll on civilians. Retrieved from https://www.washingtonpost.com/world/2024/10/11/israel-lebanon-civilian-deaths-hezbollah-war/

# 1.Legal Definitions Related to the Conflict

#### 1.1 Qualification of the Conflict

The qualification of this particular conflict constitutes a source of heavy debate among scholars and legal communities, in addition to the wide disparity of interpretations drawn from various States and international actors, such as the International Committee of the Red Cross (ICRC).

Context-wise, Lebanon, and Israel have been in a "state of war," i.e., an armed conflict since the establishment of Israel in 1948, where acts of hostilities were eventually paused under truce agreements such as in 1949, 1996, 2006, or 2024.

Until May 2000, the qualification of an international armed conflict (IAC) would stem from the state of occupation of Southern Lebanon, in the sense provided by Article 42 of the 1907 Hague Regulations under which a "territory is considered occupied when it is actually placed under the authority of the hostile army", which thus qualify as an IAC under IHL. The question of whether this qualification stands after Israel's unilateral withdrawal from Southern Lebanon has become more debated, especially since the 2006 war.

One legal interpretation consists in considering each of the armed hostilities by Israel in Lebanon within the framework of an ongoing IAC between Lebanon and Israel as two parties to the conflict, regardless of the *jus ad bellum* factors which would address more specifically the legitimacy of the military actions undertaken by either of the actors involved in the conflict under international law. As such, *jus in bello*, known as International Humanitarian Law (IHL), is undoubtedly to apply under the occurrence of an armed conflict, as highlighted by the UNHRC Commission of Inquiry after the 2006 war, considering that:

"International humanitarian law applies as soon as an armed conflict arises and it binds all the parties thereto to fully comply with it. On the basis of the factual circumstances of the conduct of the hostilities that took place, including the intensity of the violence and the use of armed force, the Commission is of the view that the existence of an armed conflict during the relevant period has been sufficiently established".

Moreover, despite the Commission acknowledging that the "hostilities were in actual fact and in the main only between the Israel Defense Forces (IDF) and Hezbollah", it further viewed that "the fact that the Lebanese Armed Forces [LAF] did not take an active part in them neither denies the character of the conflict as a legally cognizable international armed conflict,

nor does it negate that Israel, Lebanon and Hezbollah were parties to it".<sup>6</sup> The report also bases its IAC qualification on the fact that Israel had "officially stated that responsibility lies with the Government of Lebanon", regardless of the State's absence of knowledge of Hezbollah's operation of 12 July 2006, which had triggered the Israeli military response. At the same time, the targeting by the Israeli army of Lebanese infrastructure and agricultural land<sup>7</sup> and various regions<sup>8</sup> affected all of the Lebanese population, not just Hezbollah strongholds or fighters, thus reinforcing the transborder and international character of the conflict.

Another legal interpretation tends to consider the post-2000 conflicts as non-international conflicts, given the prominent place a non-State actor (Hezbollah) has been playing in the conduct of hostilities, with the Lebanese State distancing itself from the wars and repeatedly announcing its anti-war stances. This view warrants looking more closely at Hezbollah's legal status as an armed group and whether its members qualify as members of "organized resistance movements" as depicted in the Third Geneva Convention of 1949 over prisoners of wars.

Historically, Hezbollah has put much effort in establishing its right to engage in hostilities as an "armed resistance group", alongside the Lebanese Army and State in the context of an IAC against Israel. With the continuation of the occupation of Southern Lebanon into the 1980s, Hezbollah emerged among the parties to this conflict with the acknowledgement of the Lebanese State, establishing itself as a prominent actor with a stated goal of liberating Southern Lebanon from such occupation, as a fully recognized "party to the conflict".

The Ta'if Agreement of 1989, which reshaped the country's constitutional framework, had enacted Lebanon's right to take "all the steps necessary to liberate all Lebanese territories from the Israeli occupation"<sup>10</sup>, the group has ever since pursued efforts to maintain a doctrinal support to its "resistance" role, which the successive governments will regularly acknowledge under its ministerial declaration of general principles in various forms and formats. The first postwar government led by Omar Karami coined the principle of supporting "the noble resistance", with the aim of "liberating Lebanese territory [southern Lebanon] from the Israeli occupation [...] and to obtain the implementation of the resolution 425", while confirming "the right of the Lebanese to seek legitimate and national, based on the UN Charter".<sup>11</sup>

Under such configuration, an initial interpretation would grant an international character to the conflict by virtue of such organic link existing between Hezbollah and the State of Lebanon under which Hezbollah would qualify as *belonging* to a party to the conflict (the Lebanese State) under an international armed conflict with Israel, as per the disposition of Art. 4 (A parag. 2) of the Third Geneva Convention which includes into the combatants' category by qualifying to the status of prisoners of wars the

<sup>6</sup> United Nations. Human Rights Council. Commission of Inquiry on Lebanon. (2006, November 23). Report of the Commission of Inquiry on Lebanon pursuant to Human Rights Council resolution S-2/1: 3. Retrieved from https://digitallibrary.un.org/record/587605?v=pdf

<sup>7</sup> Norwegian Refugee Council.(2025, January 24). A lost harvest: the shadow of war looms over Lebanese farmers. Retrieved from https://www.nrc.no/feature/2025/a-lost-harvest-the-shadow-of-war-looms-over-lebanese-farmers

<sup>8</sup> Al Jazeera. (2024, October 4). Israel bombs Lebanon's ancient city of Tyre. Retrieved from https://www.aljazeera.com/gallery/2024/10/24/israel-bombs-lebanons-ancient-city-of-tyre

<sup>9</sup> MTV Lebanon. (2024, July 31). Mikati: Lebanon does not want war... and we warn against things getting out of hand. Retrieved from https://www.mtv.com.lb/news/ميقاق--لبنان-لا-ى-ريد-الحرب---ون-حذ-ر-من-تفل-ت-الأمور/1467176ميقاق--لبنان-لا-ى

<sup>10</sup> Section C of Part III(3): Third, liberating Lebanon from the Israeli occupation of the Ta'if Agreement (1989, November 4).

<sup>11</sup> Ministerial Declaration of the Government of Omar Karami, formed on 24 December 1990, proclaimed before the Lebanese Parliament. (1991, January 7).

"members of other militias and members of other volunteer corps, including those of organized resistance movements, belonging to a Party to the conflict and operating in or outside their own territory, even if this territory is occupied, provided that such militias or volunteer corps, including such organized resistance movements, fulfil the following conditions:

- a) that of being commanded by a person responsible for his subordinates;
- b) that of having a fixed distinctive sign recognizable at a distance;
- c) that of carrying arms openly;
- d) that of conducting their operations in accordance with the laws and customs of war".

After Israel withdrew from Southern Lebanon in May 2000, the question of the role of Hezbollah in the conduct of hostilities against Israel drew much contention. During the 2006 war, the ICRC viewed the conflict rather as "SUI GENERIS" case, i.e., unique as a standalone case in the realm of armed conflicts. ICRC legal experts provided an alternative overview of the qualification, casting

"some doubt [...] the hypothesis of Article 4A(2) of the Third Geneva Convention had been realized in the case in point. Actually, those arguments are not enough to show a sufficiently narrow link between the Hezbollah combatants and the Lebanese government. For that link to exist, those combatants need to have been acting 'on behalf of' the latter".<sup>12</sup>

The International Criminal Tribunal for former Yugoslavia (ICTY) goes further as to consider "for irregulars to qualify as lawful combatants, it appears that international rules and State practice [...] require control over them by a Party to an international armed conflict and, by the same token, a relationship of dependence and allegiance of these irregulars vis-a -vis that Party to the conflict".<sup>13</sup> This legal view beholds on how the expression 'belonging to a Party to the conflict' must be understood in the sense of Article 4A(2) of the Third Geneva Convention. In the case of Hezbollah, it seems evident that the "required degree of control was not achieved" back in 2006. On the contrary, the Lebanese authorities stated on several occasions that they had not been aware of the attacks that were at the origin of the conflict and that they did not approve of them".<sup>14</sup> The same legal analysis would stand for the military events that occurred as of October 8th, 2023, where the Lebanese government multiplied the statements under which it had no clue of the preparation of such operations, nor did it cultivate any predisposition to approve of such actions initiated by the armed group.

<sup>12</sup> Vite, S. (2009, March). Typology of armed conflicts in international humanitarian law: legal concepts and actual situations. In: International Review of the Red Cross 91(873): 91. Retrieved from https://www.icrc.org/sites/default/files/external/doc/en/assets/files/other/irrc-873-vite.pdf

<sup>13</sup> ICTY. Prosecutor v. Tadic, Judgment (Appeals Chamber), above note 2, para 94

<sup>14</sup> Vite, S. (2009, March). Typology of armed conflicts in international humanitarian law: legal concepts and actual situations. In: International Review of the Red Cross 91(873): 91. Retrieved from https://www.icrc.org/sites/default/files/external/doc/en/assets/files/other/irrc-873-vite.pdf

On the matter at hand, the most sensible legal qualification lies in a double legal classification, considering the war between Israel and Hezbollah as an international armed conflict between Israel and Lebanon, while constituting at the same time a non-international armed conflict between Israel and Hezbollah, despite the fact the hostilities were conducted across international borders.

#### 1.2 Applicable Law

Given the established legal qualification and just like during the 2006 conflict, the full scope of IHL governs the 2023-2024 conflict. Lebanon has ratified all four Geneva Conventions and its two additional protocols. It is also a party to the 1954 Hague Convention for the Protection of Cultural Property in the Event of Armed Conflict and its First Protocol. Hezbollah is also bound by these rules being a Lebanese armed group launching attacks from within the Lebanese territory. On the other hand, Lebanon is not party to the 1980 Convention on Prohibitions or Restrictions on the Use of Certain Conventional Weapons, nor to any of its Protocols.

Israel is also party to the four Geneva Conventions but has not ratified its Additional Protocols I (API) and II (APII). Furthermore, it is party to the 1954 Hague Convention for the Protection of Cultural Property in the Event of Armed Conflict and its First Protocol of 1954, the 1980 Convention on Prohibitions or Restrictions on the Use of Certain Conventional Weapons, as well as its 1980 Protocol I on non-detectable fragments, Protocol II on prohibitions or restrictions on the use of mines, booby-traps and other devices (1980 and as amended on 3 May 1996), and the 1995 Protocol IV on Blinding Laser Weapons. Israel has not ratified the 1980 Protocol III on Prohibitions or Restrictions on the Use of Incendiary Weapons (1980), nor the 2003 Protocol V on Explosive Remnants of War, nor the 2008 Cluster Munitions Convention.

Ultimately, all parties to the conflict remain bound by the full scope of international customary law governing international armed conflicts, in particular those that have acquired customary law status<sup>15</sup>.

None of the parties to the conflict are party to the Rome Statute which established the International Criminal Court (ICC). That said, the scope of the war crimes and grave breaches of IHL under article 8 of the Statute correspond to the dispositions stipulated under the four Geneva Conventions and will serve as basis for the characterization of the IHL violations in the recent war.

#### 1.3 Main Actors

#### Israel

Israel, one of the parties to this conflict with Lebanon, occupied most of Southern Lebanon between 1978 and 2000, as well as part of the Ghajar's village between 2006 and 2010. The Shebaa Farms, a small, disputed territory occupied by Israel since 1967, is claimed by Lebanon with Syrian support, while Israel insists it belongs to Syria. Hezbollah uses this ongoing occupation as justification for its attacks against Israel. The UN considers the area occupied

<sup>15</sup> ICRC. (2005). Two-volume publication on customary international humanitarian law. In: Cambridge University Press.

Syrian territory, making it a volatile point in the Israel-Lebanon conflict. With the launch of Hezbollah's military campaign against Israel on 8 October 2023 in support of the Gaza front and without consulting with Lebanese formal authorities and population, Israel has engaged in military operations against various Hezbollah strongholds across the country.

In September 2024, Israel intensified these attacks with the terrorist detonation of thousands of beepers and talkie walkies on 17 and 18 September 2024 that had been compromised and booby-trapped with explosives before they were shipped to Hezbollah's operational structure. From there, the IDF dramatically widened the scope of its conduct of hostilities against Lebanon until the cease-fire entered into force on 27 November 2024.

#### Hezbollah

Hezbollah (Party of God), an armed non-state actor, was formed in Lebanon in the aftermath of the Iranian Islamic Revolution of 1979, initially to propagate the principles of such revolution in the country with the idea of empowering the historically marginalized Shi'a community. During the same period, Lebanon was enduring a bloody civil war involving sectarian militias divided between supporting or silencing the Palestinian factions that have been active in the country since the Cairo agreement of 1969. Israel was also militarily involved and decided ultimately to invade Beirut in June 1982, creating a shock wave throughout the Arab world as it constituted the first time ever Israel would take an Arab capital. Despite withdrawing from Beirut in 1983, Israel continues to occupy a large buffer zone in Southern Lebanon, which regions are prominently Shi'a.

As it consolidated its final structure in 1985, Hezbollah took on the mission to pursue the armed resistance effort as the Palestinian *fedayins* were expelled from Lebanon, establishing itself as an "Islamic resistance" to liberate Southern Lebanon from the Israeli occupation. It will continue operating its guerilla warfare against Israel throughout the 1990s even after the end of the civil war, unconcerned with the Ta'if disarmament dispositions of all war-related militias. It eventually consolidated its political representation, establishing itself as a political party in post-war politics, acquiring significant representation inside Parliament (as of 1992) and inside the Cabinet (as of 2005).

Given Hezbollah also performs political and social functions, Israel has been keen on targeting dual-use objectives without necessarily qualifying as military objectives according to IHL principles. As mentioned in the previous section, the armed group considers the status of its fighters as "members of other militias and members of other volunteer corps, including those of organized resistance movements", in the sense of Article 4A(2) of the Third Geneva Convention (GCIII). As such, they are convinced they do fulfil the necessary conditions of being commanded by a "person responsible for his subordinates", holding a "fixed distinctive sign", "carrying arms openly" and "conducting their operations in accordance with the laws and customs of war". This in addition to Hezbollah's understanding of serving as the recipient of a formal mandate from the Lebanese authorities through the various ministerial declarations of general principles when acknowledging the right for Lebanon to resist occupation by all means necessary.

However, given the armed group is operating completely independently from the State, legal experts question the attribution of Hezbollah fighters of combatants' status in the way meant under Article 4A(2) of GCIII. Hezbollah has complicated its rules of engagement by transitioning from a Lebanese resistance movement against Israeli occupation to a spearhead of the pro-Iran 'Axis of Resistance,' with documented military, intelligence, and operational roles in Iraq (post-2003), Syria (post-2012), Yemen (post-2015), Gaza, and other regional conflicts<sup>16</sup>.

Regardless of their controversial legal status, Hezbollah fighters engaged in hostilities in the armed conflict between Israel and Lebanon remain thus bound by the full scope of IHL and are also protected by it.

#### **Lebanese Armed Forces**

Like in the 2006 war, the LAF have been targeted by Israeli strikes in the recent conflict with Israel, despite not being actively engaged in the conflict. Historically, the LAF role has shifted towards focusing on internal stability and maintaining public order. On national defense, it has been actively coordinating with Hezbollah various aspects of security tasks and missions.

In 2006, the UN Security Council Resolution (UNSCR) 1701 stipulated the deployment of the Lebanese Army to Southern Lebanon and the disarmament of Hezbollah and other armed groups operating in the region, which was not fully implemented as Hezbollah maintained its operational capacities in these areas. With the November 2024 cease-fire, the LAF was ordered to redeploy many parts of Southern Lebanon, yet many units have been subject to attacks by the IDF as the latter continues to occupy some areas and forbids the LAF and inhabitants to approach.

Under IHL rules, LAF members are combatants if engaged in hostilities. Israel uses LAF's coordination efforts with Hezbollah to consider the troops as legitimate military targets, yet have failed to provide evidence of how such communication represent direct participation in hostilities. That said, in the context of the current conflict, the LAF's non-engagement renders them non-belligerents, thus protected from being lawful targets, unless engaging actively in the conflict or if their assets are used for military purposes.

#### **Other Non-State Armed Actors**

Other armed groups operate within Lebanon including Palestinian factions, like Hamas, the Islamic Jihad, and the Fatah movement. These groups were actively targeted by Israel during the 2023-2024 war, as Hamas deputy leader Saleh Arouri was killed in Dahieh on 2 January 2024 in an air strike on the flat he was staying in. On 21 August 2024, IDF targeted and eliminated Fateh leader Khalil Al Maqdah in Saida. Despite limited engagement in the conflict, Israel and these non-state actors remain subject to IHL rules and principles.

<sup>16</sup> Middle East Institute. (2021, July 26). Hezbollah's Regional Activities in Support of Iran's Proxy Networks. Retrieved from https://www.mei.edu/publications/hezbollahs-regional-activities-support-irans-proxy-networks

#### UNIFIL

Established by the UNSCR 425 in 1978 as Israel had invaded Southern Lebanon, UNIFIL's peacekeeping mandate was significantly expanded following the UNSCR 1701 in the aftermath of the 2006 conflict between Israel and Hezbollah. The resolution tasked UNIFIL with monitoring the cessation of hostilities, supporting the LAF in deploying throughout southern Lebanon, and facilitating humanitarian access to civilians. Operating under a Chapter VI mandate, the peacekeeping force faces limitations as to its enforcement powers, relying instead on cooperation from local parties.

In the context of the 2023–2024 conflict between Israel and Hezbollah conflict, UNIFIL's role has been further tested as it was subjected to multiple attacks like during the 2006 war. UNIFIL's headquarters in Naqoura and nearby positions were repeatedly targeted by IDF, affecting its personnel's security, safety and ability to pursue its monitoring and patrolling missions.

As such, UNIFIL as a peacekeeping force does not constitute a party to the present conflict as IHL rules and State practice consider them civilians. Their personnel and facilities are entitled to the same protection against attack as that accorded to civilians and civilian objects as per dispositions in API (Articles 37 & 38) and the 1994 Convention on the Safety of UN and Associated Personnel, which criminalizes attacks on UN peacekeepers unless they engage in hostilities. Furthermore, under the Rome Statute, intentionally directing attacks against peacekeeping personnel and objects constitutes a war crime as long as they are entitled to the protection given to civilians and civilian objects under IHL.

# 2. War Crimes and Grave Breaches of the Geneva Conventions of 12 August 1949

#### 2.1 Willful killing

#### 2.1.1 Introduction

As a new conflict reignited on 8 October 2023 between Israel and Hezbollah, the scope and intensity of the hostilities conducted by both parties remained limited, as IDF targeted Southern and Eastern Lebanon with air strikes and artillery shelling. Infrastructure and residential areas were hit, in addition to targeted operations in the southern suburbs of Beirut. During this initial period prior to 15 September 2024, the Ministry of Public Health documented the killing of 645 Lebanese as a result of the Israeli hostilities.<sup>17</sup>

After 15 September 2024 and until the adoption of the cease-fire agreement on 27 November 2024, the death toll from all Israeli attacks increased to a total documented of 4,047 Lebanese killed by the IDF, including 1,106 children and women, in addition to 16,638 injured.<sup>18</sup> The raids have also displaced some 1.4 million people, leading to a severe humanitarian crisis. The total number of attacks reached 14,775, according to the detailed report of the National Council for Scientific Research issued in December 2024.<sup>19</sup> Hostilities across the border also led to the displacement of an estimated 60,000 Israeli civilians from northern Israel.<sup>20</sup>

As a result of the indiscriminate targeting of civilians throughout different Lebanese regions, the International Commission of Jurists (ICJ) alerted very quickly as to "extremely high number of civilian casualties, in the space of just a few hours, points to the indiscriminate and disproportionate nature of the IDF's attacks in violation of international humanitarian law".<sup>21</sup>

Thus, this chapter will document the unlawful targeting of protected persons and objects by the IDF in Lebanon.

<sup>17</sup> Republic of Lebanon, Ministry of Public Health. (2024, December 4). 4,047 Martyrs and 16,638 Wounded, the Total Updated Toll of the Israeli Aggression. Retrieved from https://www.moph.gov.lb/en/Media/view/77360/4047--الحصيلة-المحدثة-للعدوان-الإسرائيلي.

<sup>18</sup> Ibid.

<sup>19</sup> The National Council for Scientific Research, National Center for Natural Hazards and Early Warning. (2024, December 10). Israeli Offensive on Lebanon 2023-2024. Retrieved from https://www.cnrs.edu.lb/Library/Files/Uploaded%20Files/CNRS-L%20report%20 on%20Israeli%20Offensive%20against%20Lebanon%20203-2024%20English.pdf.

<sup>20</sup> Reuters. (2024, November 27). Israel-Hezbollah truce holds, displaced Lebanese begin to journey home. Retrieved from https://www.reuters.com/world/middle-east/israel-hezbollah-ceasefire-takes-effect-2024-11-27/?utm\_source=chatgpt.com

<sup>21</sup> International Commission of Jurists. (2024, September 24). Lebanon/Israel: Stop Unlawful Attacks and Protect Civilians Now. Retrieved from https://www.icj.org/lebanon-israel-stop-unlawful-attacks-and-protect-civilians-now/

#### 2.1.2 Targeting Journalists

#### Legal Framework

The targeting of journalists during armed conflicts is unequivocally prohibited under IHL and IHRL, as journalists are considered civilians and are entitled to protection unless they directly participate in hostilities. Article 79 of Additional Protocol I to the Geneva Conventions (1977) explicitly states that "journalists engaged in dangerous professional missions in areas of armed conflict shall be considered as civilians"<sup>22</sup> and must be safeguarded from harm. Similarly, customary IHL reinforces this protection, with Rule 34 of the ICRC's customary IHL Study, emphasizing that intentional attacks on journalists, when they are not actively participating in hostilities, constitute war crimes.<sup>23</sup> Further, the Rome Statute further solidifies this principle under Article 8(2)(b)(i) and (e)(i),<sup>24</sup> which categorize deliberate attacks on civilians, including journalists, as war crimes.

Additionally, United Nations Security Council Resolution 1738 (2006) explicitly condemns violence against journalists and calls on all parties in conflict to ensure their safety in compliance with IHL.<sup>25</sup> Beyond these legal frameworks, the International Covenant on Civil and Political Rights (ICCPR) under Article 19 guarantees the right to freedom of expression, including journalists' ability to report on conflicts without fear of violence. UN bodies such as the Human Rights Council and UNESCO have underscored the vital role journalists play in documenting conflict, stressing that targeting them not only violates their rights but also infringes on the public's right to access information.<sup>26</sup> In summary, all parties to armed conflicts are obligated to refrain from targeting journalists, take precautions to protect them from harm, and ensure accountability for violations.

#### Violations during the 2024 War

Journalists covering the 2024 war faced unprecedented levels of violence, with several reporters targeted in airstrikes, gunfire, and raids by Israeli forces. From the killing of Reuters photojournalist Issam Abdallah in South Lebanon to the airstrikes on Al-Mayadeen and Al-Manar journalists, the attacks reflect a pattern of targeting media professionals despite their clear press markings. These incidents, many of which occurred in civilian areas, not only violate IHL but also threaten press freedom and the essential role of journalists in documenting conflict. The following cases highlight the journalists who lost their lives or were injured while fulfilling their duty to report on the war:

<sup>22</sup> International Committee of the Red Cross. (1977). Protocol Additional to the Geneva Conventions of 12 August 1949, and relating to the Protection of Victims of International Armed Conflicts (Protocol I). Article 79. Retrieved from https://ihl-databases.icrc.org/ihl

<sup>&</sup>quot;Civilian journalists are protected as civilians under international humanitarian law, provided that they do not take a direct part in hostilities. Attacks directed against them are prohibited unless and for such time as they take a direct part in hostilities." – International Committee of the Red Cross. (2005). Customary International Humanitarian Law: Volume I, Rules. Rule 34: Journalists. In: Cambridge University Press. Retrieved from https://ihl-databases.icrc.org/customary-ihl/eng/docs/v1\_rul\_rule34

<sup>24</sup> International Criminal Court. (1998). Rome Statute of the International Criminal Court. Article 8(2)(b)(i) and (e)(i). Retrieved from https://www.icc-cpi.int/resource-library/documents/rs-eng.pdf

<sup>25 &</sup>quot;Reaffirms the obligation under international law to protect journalists, media professionals and associated personnel engaged in dangerous professional missions in areas of armed conflict, and condemns attacks against them; stresses the need for all parties involved in armed conflicts to respect the professional independence and rights of journalists as civilians under international humanitarian law." –United Nations Security Council. (2006). Resolution 1738 (2006), Adopted by the Security Council at its 5613th meeting, on 23 December 2006 (S/RES/1738). Retrieved from https://undocs.org/S/RES/1738(2006)

<sup>26</sup> United Nations Educational, Scientific and Cultural Organization. (2015). Journalism, press freedom, and transparency in conflict zones. UNESCO. Retrieved from https://www.unesco.org

Date	Media outlet	Targeting Details
October 25, 2023	Multiple	On October 25, an Israeli airstrike targeted a compound in the southern Lebanese town of Hasbaya that housed 18 journalists from various media organizations. The strike resulted in the deaths of three individuals: Ghassan Najjar, a camera operator for the pro-Hezbollah channel Al-Mayadeen TV; Mohammed Reda, a broadcast engineer; and Wissam Kassem, a camera operator for Al-Manar TV, which is owned by Hezbollah. <sup>27</sup>
October 20, 2023	Sawt El Farah Radio Station	On October 20, Israeli forces targeted a building in the southern Lebanese city of Tyre that housed the Hezbollah-affiliated financial institution Al-Qard Al-Hasan and the local radio station Sawt Al Farah. The building was evacuated prior to the strike, and no casualties were reported. The 34-year-old station—one of the oldest in south Lebanon—halted its broadcast following the bombing, although its website remains active. <sup>28</sup>
October 21, 2024	Al-Mayadeen Office Staff	An Israeli airstrike targeted Al-Mayadeen TV's office located in an apartment in a residential building in Jnah, Beirut. The office was struck by two rockets, completely destroying it and sparking a fire, as reported by Lebanon's National News Agency (NNA). <sup>29</sup>
October 15, 2024	Ali Shoaib (Al-Manar TV)	Journalist Ali Shoaib from Al-Manar TV was targeted by Israeli forces in South Lebanon while covering events near the Lebanese-Israeli border. He was injured during the attack, which is considered a violation of international protections for journalists. <sup>30</sup>
October 13, 2023	Multiple	An Israeli airstrike targeted a group of journalists covering events in Alma al-Shaab, South Lebanon. Issam Abdallah, a Reuters photojournalist, was killed, while other journalists, including those from Al Jazeera and AFP, were injured. The journalists were wearing clearly marked press gear. <sup>31</sup>

<sup>27</sup> Committee to Protect Journalists. (2024, October 29). Journalists face Israeli strikes, displacement, attacks as war escalates in Lebanon. Retrieved from https://cpj.org/2024/10/journalists-face-israeli-strikes-displacement-attacks-as-war-escalates-in-lebanon/ 28 Ibid.

<sup>29</sup> Middle East Eye. (2023, October 21). Al-Mayadeen office completely destroyed by Israeli strike. Retrieved from https://www.middleeasteye.net/live-blog/live-blog-update/al-mayadeen-office-completely-destroyed-israeli-strike?nid=402086&topic=Israel%2 527s%2520war%2520on%2520Gaza&fid=535616, (accessed 26.01.25)

<sup>30</sup> SKeyes Media. (2024, October 16). إصابة الصحافي علي شعيب خلال تغطيته الأحداث في جنوب لبنان [Journalist Ali Shoaib injured while covering events in South Lebanon]. Retrieved from https://www.skeyesmedia.org/ar/News/News/16-10-2024/11988, (accessed 26.01.25)

<sup>31</sup> Legal Agenda. (2023, October 13). إخبار عن جرائم حرب رقم 9: استهداف صحافيير [Report on War Crimes No. 9: Targeting Journalists]. Retrieved from https://legal-agenda.com/إخبار-عن-جرائم-حرب-رقم و--استهداف-صحافيي/, (accessed 26.01.25)

October 12, 2024	Hussein Safa (Hawana Lebanon)	An Israeli airstrike on Maifadoun during the night resulted in the death of Hussein Safa, a photographer for the media website "Hawana Lebanon," from the town of Zebdine. <sup>32</sup>
October 3, 2024	Belgian Channel Reporter and Cameraman	Following an Israeli airstrike on the Islamic Health Authority center in the Bachoura area of Beirut, gunfire was directed at a Belgian channel reporter, injuring his leg. His accompanying cameraman was also brutally assaulted during the coverage. <sup>33</sup>
September 25, 2024	Kamel Karky (Al-Manar TV)	An Israeli airstrike on the town of Al-Qantara resulted in the martyrdom of Kamel Karky, a photographer for Al-Manar TV. The attack targeted a civilian area during ongoing hostilities. <sup>34</sup>

The deliberate targeting of journalists by Israeli forces represents a grave violation of IHL and press freedoms. From airstrikes on clearly marked press vehicles to assaults on media offices and the killing of reporters like Issam Abdallah, Hadi al-Sayyed, and others, these actions are not isolated incidents but seem to partake in a broader pattern of aggression. Journalists play a vital role in documenting the truth and ensuring accountability, yet their lives are being placed in direct jeopardy, often in civilian areas. These acts amount to war crimes and demand immediate international condemnation and accountability to safeguard the rights and safety of journalists in conflict zones.

# 2.2 Willfully causing great suffering, or serious injury to body or health

On 17 and 18 September 2024, Lebanon experienced a series of unprecedented attacks targeting Hezbollah operatives through explosive-laden pagers and walkie-talkies, leading to significant casualties and widespread panic. At least 39 persons were killed, including two children and close to 3,500 people were injured<sup>35</sup>, including many civilians such as nurses and doctors who traditionally use this type of equipment. While one medic and one nurse working in health institutions within the orbit of Hezbollah eventually died from their injuries<sup>36</sup>, all major hospitals confirmed that their own pagers devices were not affected by the attack.

<sup>32</sup> MTV Lebanon. (2023, October 13). Journalist martyred in an Israeli raid. Retrieved from https://www.mtv.com.lb/en/News/Local/1500287/journalist-martyred-in-an-israeli-raid, (accessed 26.01.25)

<sup>33</sup> MTV Lebanon. (2023, October 7). Photo: Gunfire directed at a reporter. Retrieved from https://www.mtv.com.lb/en/News/Local/1495077/photo--gunfire-directed-at-a-reporter, (accessed 26.01.25)

<sup>34</sup> An-Nahar. (2023, October 13). استشهاد المصور في قناة المنار كامل كركي بغارة إسرائيلية على بلدة القنطرة [The martyrdom of Al-Manar TV photographer Kamel Karky in an Israeli airstrike on the town of Al-Qantara]. Retrieved from https://www.annahar.com/arabic/section/76-مستشهاد-المصور-في-قناة-المنار-كامل-كركي-بغارة-إسرائيلية-على-بلدة-القنطرة-340559/استشهاد-المصور-في-قناة-المنار-كامل-كركي-بغارة-إسرائيلية-على-بلدة-القنطرة

<sup>35</sup> Reuters. (2024, October 16). How Israel's bulky pager fooled Hezbollah. Retrieved from https://www.reuters.com/graphics/ISRAEL-PALESTINIANS/HEZBOLLAH-PAGERS/mopawkkwjpa/, (accessed 26.01.25)

<sup>36</sup> Amnesty International. (2024, September 20). Lebanon: Establish international investigation into deadly attacks using exploding portable devices. Retrieved from https://www.amnesty.org/en/latest/news/2024/09/lebanon-establish-international-investigation-into-deadly-attacks-using-exploding-portable-devices/

According to available reports, it seems explosives had been covertly embedded within the pagers and walkie-talkies procured by Hezbollah through an international contract, before being shipped to Hezbollah's purchasing unit through deceptive factories operated by the Israeli intelligence services. The compromised devises were then distributed to Hezbollah affiliated operatives throughout the Lebanese territory during the months preceding the war, before they were detonated simultaneously across Lebanon upon the reception of a broadcasted message.<sup>37</sup>Such use of deceptive tactics contradicts the laws of war, and a number of international conventions attached to the use of conventional weapons. It seems clear that it was impossible for the perpetrators of these attacks to verify who would actually be in the possession of such devices at the moment of the detonation and know ahead who would be harmed, or even whether only individuals actively taking part in combat had been given the pagers and radio devices. Furthermore, the explosions occurred within civilian facilities such as busy public areas, supermarkets, medical facilities and residential homes and shops, causing traumatic injuries and spreading widespread terror and panic across Lebanon. Thus, the indiscriminate nature of these attacks is prohibited under Article 51(4) of API, which was highlighted by an Amnesty International report. The latter determined that under the given circumstances:

"the attacks [...] carried out indiscriminately would be unlawful under international humanitarian law and should be investigated as war crimes. The attacks also violated at a minimum the right to life under international human rights law, which continues to apply in situations of armed conflict, and likely other human rights, depending on the various impacts of the attack on the Lebanese population and their daily lives". 38

These attacks also violate Article 23(e) of the Hague Regulations of 1907, which prohibits "employing arms, projectiles, or material calculated to cause unnecessary suffering", thus breaching the principle of proportionality under IHL. As such, the prohibition of unnecessary suffering constitutes a fundamental rule under IHL designed to limit the effects of war and prevent excessive harm to combatants and civilians. Because of life-changing and permanent injuries such attacks have caused, the latter clearly qualify as unnecessary suffering under IHL rules.

Moreover, Israel which is party to the Second Protocol on Prohibitions or Restrictions on the Use of Mines, Booby-Traps and Other Devices as amended on 3 May 1996, bluntly violated its own interpretation of the given instrument. Upon ratification of the Second Protocol, it affirmed that "nothing in the Amended Protocol II may be construed as restriction or affecting in any way non-lethal weapon technology that is designed to temporarily disable, stun, signal the presence of a person, or operate in any other fashion, but not to cause permanent incapacity".<sup>39</sup>

<sup>37</sup> The Times. (2024, December 23). Israel's exploding pager plot was 'planned for a decade'. Retrieved from https://www.thetimes.com/world/us-world/article/israel-mossad-exploding-pager-plot-planned-for-decade-50hwtgfrf.

<sup>38</sup> Amnesty International. (2024, September 20). Lebanon: Establish international investigation into deadly attacks using exploding portable devices. Retrieved from https://www.amnesty.org/en/latest/news/2024/09/lebanon-establish-international-investigation-into-deadly-attacks-using-exploding-portable-devices/

<sup>39</sup> United Nations. (1996, May 3). Israel reservations to the Second Protocol. Retrieved from https://treaties.un.org/pages/ ViewDetails.aspx?chapter=26&clang= en&mtdsg no=XXVI-2-b&src=TREATY

# 3. War Crimes and Serious Violations of the Laws and Customs Applicable in International Armed Conflict, Within the Established Framework of International Law

3.1 Intentionally directing attacks against the civilian population as such or against individual civilians not taking direct part in hostilities

#### 3.1.1 Targeting of Civilians

#### Legal Framework

The targeting of civilians is explicitly prohibited under IHL, which establishes the protection of individuals not participating in hostilities. Article 51(2) of Additional Protocol I to the Geneva Conventions (1977) states: "The civilian population as such, as well as individual civilians, shall not be the object of attack." These provisions underline the principle of distinction, a core tenet of IHL, which obligates parties to an armed conflict to differentiate between combatants and civilians at all times. It

Additionally, the Rome Statute criminalizes the targeting of civilians as a war crime under Article 8(2)(b)(i), which applies to international armed conflicts. These provisions define such acts as: "Intentionally directing attacks against the civilian population as such or against individual civilians not taking direct part in hostilities".<sup>42</sup> This further reinforces the prohibition on the deliberate targeting of civilians, making it a prosecutable offense under international criminal law.

<sup>40</sup> International Committee of the Red Cross. (1977). Protocol Additional to the Geneva Conventions of 12 August 1949, and relating to the Protection of Victims of International Armed Conflicts (Protocol I). Article 51(2). Retrieved from https://ihl-databases.icrc.org/ihl/INTRO/470

<sup>41</sup> International Committee of the Red Cross. (1977). Additional Protocol I to the Geneva Conventions of 12 August 1949. Retrieved from https://ihl-databases.icrc.org/ihl/INTRO/475

<sup>42</sup> International Criminal Court. (1998). Rome Statute of the International Criminal Court. Articles 8(2)(b)(i) and 8(2)(e)(i). Retrieved from https://www.icc-cpi.int/resource-library/documents/rs-eng.pdf

More generally, the targeting of civilians also contravenes the principles of proportionality and necessity. The principle of proportionality, enshrined in Article 57 of Additional Protocol I, prohibits attacks that may result in excessive harm to civilians in relation to the anticipated military advantage. Further, the principle of necessity limits the use of force to actions strictly required to achieve a legitimate military objective.

Customary IHL further solidifies the prohibition on targeting civilians through Rule 1 (obligation to distinguish between civilians and combatants) and Rule 156 (individual criminal responsibility for war crimes) of the ICRC's Customary Law Study.<sup>44</sup> It is important to mention that these rules apply universally to both state and non-state actors, regardless of treaty ratifications.

In addition to IHL, international human rights law provides complementary civilian protections. Article 6 of ICCPR guarantees the right to life and prohibits the arbitrary deprivation of life, even during armed conflict. In addition, international courts and tribunals have reinforced the prohibition against targeting civilians. For example, in Prosecutor v. Tadić (ICTY, 1997), the International Criminal Tribunal for the Former Yugoslavia underscored the obligation to protect civilians in both international and non-international armed conflicts.<sup>45</sup>

#### Violations during the 2024 War

The Israeli military operations in Lebanon during 2024 have resulted in severe violations of IHL, specifically targeting civilians in numerous incidents. These attacks have led to an alarming death toll, exceeding 4000 by December 2024, <sup>46</sup> raising serious concerns about the conduct of military operations and adherence to the principles of distinction and proportionality under IHL.

In the October 2024 airstrike on Aitou, a town in northern Lebanon, Israeli forces targeted a civilian area, resulting in at least 21 fatalities, including 12 women and two children. Additionally, eight others were injured.<sup>47</sup> This attack marked a particularly troubling act as Aitou is a civilian-populated area, with no clear military objective being targeted. The Aitou incident is particularly incriminating for Israel as the individual presumed to be the intended target was a journalist working for Al-Manar. Therefore, Israel cannot demonstrate — and has not provided any explanation—that this person was a legitimate military objective, making the strike an extrajudicial killing. Additionally, even if the journalist were to be presented as a legitimate military target, the resulting civilian casualties render the attack indiscriminate and therefore unlawful under IHL.

<sup>43</sup> International Committee of the Red Cross. (1977). Protocol Additional to the Geneva Conventions of 12 August 1949, and relating to the Protection of Victims of International Armed Conflicts (Protocol I). Article 57. Retrieved from https://ihl-databases.icrc.org/ihl/INTRO/470

<sup>44</sup> International Committee of the Red Cross. (2005). Customary international humanitarian law: Volume I: Rules, Rule 1 and Rule 156. In: Cambridge University Press. Retrieved from https://ihl-databases.icrc.org/customary-ihl/eng/docs/v1\_rul\_rule1

<sup>45 &</sup>quot;The protection of civilians and civilian property is an essential feature of the laws of war. This protection is afforded to civilians irrespective of their nationality, religion or political affiliation. It applies equally to civilians in both international and non-international armed conflicts."—International Criminal Tribunal for the Former Yugoslavia. (1997). Prosecutor v. Tadić, Case No. IT-94-1-T, Judgment, para. 138, 7 May 1997. Retrieved from https://www.icty.org/en/case/tadic

<sup>46</sup> ReliefWeb. (2024, December 10). Escalation of hostilities in Lebanon: Public health situation analysis (PHSA). Retrieved from https://reliefweb.int/report/lebanon/escalation-hostilities-lebanon-public-health-situation-analysis-phsa-10-december-2024#:~:text=SUMMARY%200F%20CRISIS%20AND%20KEY%20FINDINGS&text=On%20average%2C%20250%20people%20 have,as%20of%204%20December%202024

<sup>47</sup> Al Jazeera. (2024, October 14). Israeli strike kills 18 in northern Lebanon as Hezbollah steps up attacks. Retrieved from https://www.aljazeera.com/news/2024/10/14/israeli-strike-kills-18-in-northern-lebanon-as-hezbollah-steps-up-attacks

Similarly, in the town of Nabatieh, on October 16, 2024, Israeli airstrikes targeted a municipal building, killing 16 civilians, including key municipal staff coordinating aid, including the mayor.<sup>48</sup> The attack in Qana on October 15, 2024, left at least 10 civilians dead and 54 injured, despite the town's historical significance for civilian casualties during previous conflicts.

In November 2024, the situation escalated further with targeting densely populated areas. An airstrike in Basta, central Beirut, led to at least 29 deaths and 67 injuries. The attack caused extensive damage, destroying residential buildings and further highlighting the lack of distinction between military and civilian targets.<sup>49</sup> In the Nabatieh district of southern Lebanon, airstrikes on December 4, 2024, resulted in nine additional civilian deaths, continuing the pattern of indiscriminate attacks on civilian infrastructure and populations.<sup>50</sup> These attacks occurred despite ongoing ceasefire negotiations, adding more complexity to the issue.

By December 2024, the death toll had surpassed 4,000 civilians, with a significant portion of these deaths attributed to airstrikes targeting civilian areas with disregard to principles of distinction and proportionality.<sup>51</sup> The Lebanese Health Ministry confirmed that the majority of the casualties were non-combatants, further underscoring the scale of the violations. These numbers continue to rise during the ceasefire, especially after people started returning to areas on the 27th of January, the last day of the 60-day ceasefire, as Israeli airstrikes and artillery bombardments persist in targeting residential and urban areas, compounding the already dire humanitarian crisis.<sup>52</sup>

The systematic targeting of civilians, as evidenced by these attacks, constitutes a grave violation of IHL, specifically the Geneva Conventions and the Rome Statute. The airstrikes, which killed thousands of innocent civilians, demonstrate a blatant disregard by IDF for the principles of distinction and proportionality that govern the conduct of war.

International calls for accountability have been amplified as the scale of civilian deaths and injuries continues to grow. Human rights organizations such as Amnesty International and Human Rights Watch have condemned these actions and called for thorough investigations into the Israeli military's conduct during the conflict.<sup>53</sup> These organizations have highlighted the need for accountability, citing the repeated targeting of civilian populations as evidence of war crimes. The continued targeting of civilians without distinction is a direct breach of the protections guaranteed under international law, raising serious concerns about the legal and moral implications of the ongoing conflict.

<sup>48</sup> Al Jazeera. (2024, October 16). Mayor among 16 killed in Israeli attack on south Lebanon municipal building. Retrieved from https://www.aljazeera.com/news/2024/10/16/israel-resumes-beirut-strikes-despite-us-opposition

<sup>49</sup> Al Jazeera. (2024, November 23). Israeli airstrike kills 29 in central Beirut. Retrieved from https://www.aljazeera.com/news/2024/11/23/israeli-missiles-strike-residential-building-in-central-beirut

<sup>50</sup> Amnesty International. (2024, December 12). Lebanon: Israeli air strikes that killed at least 49 civilians further evidence of war crimes. Retrieved from https://www.amnesty.org/en/latest/news/2024/12/lebanon-israeli-air-strikes-that-killed-at-least-49-civilians-further-evidence-of-war-crimes/

<sup>51</sup> ReliefWeb. (2024, December 10). Escalation of hostilities in Lebanon: Public health situation analysis (PHSA). Retrieved from https://reliefweb.int/report/lebanon/escalation-hostilities-lebanon-public-health-situation-analysis-phsa-10-december-2024#:~:text=SUMMARY%200F%20CRISIS%20AND%20KEY%20FINDINGS&text=On%20average%2C%20250%20people%20 have.as%20of%204%20December%202044

<sup>52</sup> Associated Press. (2024, December 12). Lebanon-Israel ceasefire: IDF withdrawal, protesters killed. Retrieved from https://apnews.com/article/lebanon-israel-ceasefire-idf-withdrawal-protesters-killed-4e4f3fc42a44762d1df8dbdbbdfcf213

<sup>53</sup> ReliefWeb. (2024, December 12). Global coalition of NGOs calls for immediate ceasefire in Lebanon. Retrieved from https://reliefweb.int/report/lebanon/global-coalition-ngos-call-immediate-ceasefire-lebanon-enar

#### Hezbollah's Attacks against Northern Israel Cities

Since 8 October 2023, Hezbollah has launched sustained military operations against northern Israeli cities, which led to the escalation of tensions along the Israel-Lebanon border. With the objective of showing support to the Palestinian armed group Hamas and push Israel to cease its attack on Gaza, the Party of God initiated a number of hostilities against Israeli targets, be it through rocket and missile strikes, drone incursions and anti-tank guided missile attacks.

The attacks have led to the killing of 45 civilians (among whom Arab Israelis and Thai workers), in addition to 83 military personnel killed, in addition to mass displacement of 68,000 Israelis, and significant damage to infrastructure.<sup>54</sup> Primarily, Hezbollah targeted cities and towns in northern Israel, including Kiryat Shmona, Metula, Safed, and Nahariya, and reached the harbor city of Haifa further south. According to Israeli sources, Hezbollah launched more than 5,000 attacks between October 2023 and November 2024,<sup>55</sup> with a notable increase in intensity from September 2024 onwards as the IDF significantly escalated their conduct of hostilities after the pagers' terrorist operation.

The most significant attacks after September 2024 were the coordinated attack involving 150 rockets struck the Haifa area and Jezreel Valley, injuring six people and damaging multiple buildings on 22 September 2024. On 31 October 2024, a Hezbollah rocket attack on Metula killed five civilians, including farm workers.

Amnesty International considered in a December 2024 report that "the use of these inherently inaccurate weapons in or near populated civilian areas amount to prima facie violations of international humanitarian law. Civilians and civilian objects are not targets and must be protected. Direct attacks on civilians and civilian objects and indiscriminate attacks that kill and injure civilians must be investigated as war crimes." <sup>56</sup>

#### 3.1.2 Human shields

#### Legal Framework

The definition of a human shield is not codified as a single, universally agreed-upon definition in one specific treaty. However, various international legal instruments and documents address and explain the concept. First, the use of human shields is strictly prohibited under IHL as it deliberately puts civilians in danger by placing them in or near military objectives to deter attacks. Article 51(7) of Additional Protocol I to the Geneva Conventions (1977) explicitly states: "The presence or movements of the civilian population or individual civilians shall not be used to render certain points or areas immune from military operations, in particular, in attempts to shield military objectives from attacks or to shield, favor, or impede military operations."<sup>57</sup>

<sup>54</sup> ALMA Research and Education Center.(2024, November 27). Summary of War Data – Israel Northern Arena (2023-2024). Retrieved from https://israel-alma.org/summary-of-war-data-israel-northern-arena-2023-2024/?utm\_source=chatgpt.com

<sup>56</sup> Amnesty International. (2024, December 20). Israel: Hezbollah's use of inherently inaccurate weapons to launch unlawful attacks violates international law. Retrieved from https://www.amnesty.org/en/latest/news/2024/12/israel-hezbollahs-use-of-inherently-inaccurate-weapons-to-launch-unlawful-attacks-violates-international-law/.

<sup>57</sup> International Committee of the Red Cross. (1977). Protocol Additional to the Geneva Conventions of 12 August 1949, and relating to the Protection of Victims of International Armed Conflicts (Protocol I). Retrieved from https://ihl-databases.icrc.org/ihl/INTRO/470

Similarly, in non-international armed conflicts, Article 13(1) of Additional Protocol II mandates the protection of civilians and prohibits their use in military operations. <sup>58</sup> Additionally, the Rome Statute reinforces this prohibition, criminalizing the use of human shields as a war crime under Article 8(2)(b)(xxiii), which prohibits "utilizing the presence of a civilian or other protected person to render certain points, areas, or military forces immune from military operations." Further, customary IHL solidifies this prohibition through Rule 97 of the ICRC Customary Law Study: "The use of human shields is prohibited." <sup>60</sup>

It is important to mention that these rules universally bind both state and non-state actors, irrespective of treaty ratification, emphasizing the principles of distinction and proportionality. The former obligates parties to a conflict to differentiate between civilians and combatants, while the latter prohibits attacks that would cause excessive civilian harm relative to the anticipated military advantage. Indeed, jurisprudence from international courts has reinforced these principles, such as in Prosecutor v. Blaškić (ICTY, 2000), which condemned the use of civilians as shields and affirmed its illegality under customary IHL.<sup>61</sup>

#### Violations during the 2024 War

As a guerilla armed group which gathers strong social adhesion in Shi'a majority regions, it has become a common practice for Hezbollah to hide and use military equipment and material nearby civilian objects such as residential areas, schools or religious institutions. Despite constituting grave violations to IHL, Hezbollah never altered this particular means of conducting hostilities, which grants him military leverage in its confrontation with Israel. Such practices were also observed during the 2024 war in Lebanon, as numerous violations of international humanitarian law occurred particularly in relation to the use of human shields and the targeting of civilian areas. Below is a detailed account of incidents reported during the conflict:

#### Accusations Against Hezbollah:

 September 24, 2024: IDF spokesperson Avichay Adraee announced on platform X that Hezbollah has been concealing trucks loaded with rocket launchers inside homes inhabited by Lebanese families. The IDF targeted a building in the village of Sidiqin, where a truck carrying a rocket launcher and munitions was allegedly located.<sup>62</sup>

<sup>58</sup> International Committee of the Red Cross. (1977). Protocol Additional to the Geneva Conventions of 12 August 1949, and relating to the Protection of Victims of Non-International Armed Conflicts (Protocol II). Retrieved from https://ihl-databases.icrc.org/ihl/INTRO/475
59 International Criminal Court. (1998). Rome Statute of the International Criminal Court. Retrieved from https://www.icc-cpi.int/resource-library/documents/rs-eng.pdf

<sup>60</sup> International Committee of the Red Cross. (2005). Customary international humanitarian law: Volume I: Rules. In: Cambridge University Press. Retrieved from https://ihl-databases.icrc.org/customary-ihl/eng/docs/v1\_rul\_rule97

<sup>61 &</sup>quot;The use of civilians as human shields, that is to say, to force them to remain in places where the armed forces are present, or to directly cover military objectives, constitutes a grave breach of international humanitarian law and a war crime under customary law." –International Criminal Tribunal for the Former Yugoslavia. (2000). Prosecutor v. Blaškić, Case No. IT-95-14-T, Judgment, para. 512, 3 March 2000. Retrieved from https://www.icty.org/en/case/blaskic

<sup>62</sup> Adraee, A. [@AvichayAdraee]. (n.d.). Hezbollah hides trucks carrying rocket-launchers inside civilian homes; based on precise intelligence, we struck a building in Sidiqin and destroyed a truck loaded with a launcher and rockets [Tweet]. X. https://x.com/AvichayAdraee/status/1838644438958002371

- October 4, 2024: The IDF stated that it had discovered and seized numerous weapons left behind by Hezbollah militants in southern Lebanon. The 188th Armored Brigade conducted ground operations within civilian villages, alledgedly finding munitions, rocket launchers, and anti-tank missiles concealed within residential structures.<sup>63</sup>
- October 10, 2024: Adraee claimed that Israeli forces uncovered weapons in nearly every house in a Shiite town near the border, further illustrating allegations that Hezbollah deliberately hid military assets in civilian homes.<sup>64</sup>
- October 15, 2024: The IDF released a video on platform X showing multiple munitions inside a civilian house in southern Lebanon.<sup>65</sup>
- October 23, 2024: The Israeli army reportedly destroyed tunnels and military infrastructure in southern Lebanon. Among these discoveries was a weapons cache inside a mosque in a residential area, which included grenade launchers, anti-tank missiles, and RPGs.<sup>66</sup>
- October 29, 2024: A video published by the IDF showed weapons, likely belonging to Hezbollah, inside a civilian house in southern Lebanon.<sup>67</sup>
- November 4, 2024: Adraee revealed that the IDF engineering units uncovered a rocket storage facility in southern Lebanon's rugged terrain. This facility contained munitions and weapons concealed underground, further substantiating Israeli claims of Hezbollah embedding military assets in civilian regions. The same day, Adraee accused Hezbollah of planting over half a ton of explosives beneath civilian homes in the southern Lebanese town of Yarine, alleging these explosives had been hidden before the town's evacuation.<sup>68</sup>
- November 8, 2024: The Israeli military reported locating a Hezbollah training center approximately 200 meters from a UNIFIL position in southern Lebanon. The proximity to a UN facility raised concerns about exploiting neutral zones for military purposes.<sup>69</sup>

<sup>63</sup> IMLebanon. (2024, October 4). الجيش الاسرائيلي يقتحم المنازل في كفركلا! فيديو [The Israeli army raids houses in Kfar Kila! Video]. Retrieved from https://www.imlebanon.org/2024/10/04/israel-avichay233/https://www.imlebanon.org/2024/10/04/israel-avichay233/

<sup>64</sup> MTV Lebanon. (2024, October 10). Watch: Enemy Claims to Find Weapons in Houses. Retrieved from https://www.mtv.com. lb/en/News/Local/1499498/watch--enemy-claims-to-find-weapons-in-houseshttps://www.mtv.com.lb/en/News/Local/1499498/watch--enemy-claims-to-find-weapons-in-houses

<sup>65</sup> Israel Defense Forces [@IDF]. (n.d.). [Video showing multiple munitions inside a civilian house in southern Lebanon] [Tweet]. X. https://x.com/IDF/status/1846187356296012111/video/1

 $<sup>66 \</sup>quad This is Lebanon. (2024, October 23). The Israeli Army claims to have found we apons inside a mosque in southern Lebanon. Retrieved from https://www.thisislebanon.com/lebanon/411087/https://www.thisislebanon.com/lebanon/411087/$ 

<sup>67</sup> Israel Defense Forces. (2024, November). RAW FOOTAGE of Hezbollah Weapons in a Civilian House in Southern Lebanon [Video]. YouTube. https://www.youtube.com/watch?v=wICGBerxWSQ

<sup>68</sup> MTV Lebanon. (2024, November 4). Adraee: Hezbollah Planted Half a Ton of Explosives Under Southern Town. Retrieved from https://www.mtv.com.lb/en/News/Local/1511999/adraee--hezbollah-planted-half-a-ton-of-explosives-under-southern-town

<sup>69</sup> This is Lebanon. (2024, November 8). The Israeli Army: We spotted a Hezbollah training center near UNIFIL. Retrieved from https://www.thisislebanon.com/lebanon/421568/https://www.thisislebanon.com/lebanon/421568/

 November 18, 2024: IDF spokesperson Avishai Adraee announced the destruction of numerous rocket launchers and military equipment in southern Lebanon. The IDF targeted underground infrastructures used by Hezbollah, reportedly discovering living quarters, food supplies, kitchens, and weapons. Adraee shared images of these facilities on X, emphasizing Hezbollah's use of civilian areas to shield its military operations.

#### Actions by Hezbollah and Local Municipalities:

 October 30, 2024: Municipalities in Aley District's Aarayia and Kahaleh issued a joint statement condemning the use of civilian roads and vehicles for transporting armed individuals, weapons, and ammunition. They called on the Lebanese Army and security forces to take immediate action to prevent these activities, which endangered local residents and travelers.<sup>71</sup>

In conclusion, while evidence was presented to substantiate Hezbollah's use of human shields, Israel's targeting of civilian areas, often without sufficient explanation, raised significant concerns regarding the proportionality and legality of its military operations.

# 3.2 Intentionally directing attacks against civilian objects, that is, objects which are not military objectives

#### 3.2.1 Legal Framework

The intentional targeting of civilian objects, which are defined as objects that do not have a military purpose or function, is prohibited under IHL. As previously stated, IHL seeks to protect civilian populations and civilian property during armed conflict by distinguishing between military and non-military targets. The Geneva Conventions, Additional Protocols, and the Rome Statute of the ICC are the primary legal instruments prohibiting such attacks.

Additional Protocol I to the Geneva Conventions supplements the rules governing international armed conflicts, as Article 52(1) states explicitly: "Civilian objects shall not be the object of attack or reprisals." This provision establishes the general principle that objects, not military objectives, must not be targeted. Further, Article 52(2) of the same protocol defines civilian objects as "all objects which are not military objectives." Therefore, the article puts forward the importance of distinction, a fundamental principle of IHL, and mandates that only military objectives may be targeted during an armed conflict.

<sup>70</sup> IMLebanon. (2024, November 18). (فيديو) "الجيش الإسرائيلي يدمّر وسائل قتالية لـ"الحزب" (فيديو) [The Israeli army destroys Hezbollah's combat equipment (video)]. Retrieved from https://www.imlebanon.org/2024/11/18/israel-army-hezb-14/https://www.imlebanon.org/2024/11/18/israel-army-hezb-14/

<sup>71</sup> This is Lebanon. (2024, October 30). The municipalities of Aarayia and Kahaleh: Prevent the use of international roads for military purposes. Retrieved from https://www.thisislebanon.com/lebanon/415775/

<sup>72</sup> International Committee of the Red Cross. (1977). Protocol Additional to the Geneva Conventions of 12 August 1949, and relating to the Protection of Victims of International Armed Conflicts (Protocol I), Article 52. Retrieved from https://ihl-databases.icrc.org/ihl/INTRO/470

<sup>73</sup> Ibid., Article 52 (2).

Additionally, the Rome Statute, which provides a legal framework for prosecuting war crimes, also prohibits the intentional targeting of civilian objects. Article 8(2)(b)(ii) of the Rome Statute criminalizes "intentionally directing attacks against civilian objects, that is, objects which are not military objectives."<sup>74</sup> This provision makes it clear that the deliberate destruction of civilian objects, such as infrastructure, residential areas, and cultural property, is considered a war crime under international law.

Customary IHL further solidifies the prohibition of attacks against civilian objects. According to the ICRC's Customary IHL Study, Rule 7 emphasizes that parties to an armed conflict must distinguish between civilian objects and military objectives and that attacks must be directed only at military targets. As established in Rule 8, intentional attacks against civilian objects are prohibited under customary law, regardless of whether the object is protected explicitly under treaty law.

These regulations also correlate to the principles of distinction and proportionality. The former mandates that all parties to a conflict must differentiate between civilian objects and military objectives. Additional Protocol I, Article 48, emphasizes this obligation: "the parties to the conflict shall at all times distinguish between the civilian population and combatants and between civilian objects and military objectives." And the latter, as outlined in Article 51(5) (b) of Additional Protocol I, further governs the targeting of military objectives and prohibits attacks that may cause excessive civilian harm or damage in relation to the anticipated military advantage.

Finally, international courts have affirmed the prohibition of targeting civilian objects. For instance, in Prosecutor v. Tadić, the ICTY highlighted the need to respect the distinction between civilian property and military objectives and emphasized that attacks against civilian objects are prohibited under IHL.<sup>78</sup> Similarly, in the ICC case of Prosecutor v. Bosco Ntaganda, the court reaffirmed the illegality of targeting civilian objects without military justification.<sup>79</sup>

<sup>74</sup> International Criminal Court. (1998). Rome Statute of the International Criminal Court, Article 8(2)(b)(ii). Retrieved from https://www.icc-cpi.int/resource-library/documents/rs-eng.pdf

<sup>75 &</sup>quot;The parties to the conflict must at all times distinguish between civilian objects and military objectives. Attacks may only be directed against military objectives. Attacks must not be directed against civilian objects." –International Committee of the Red Cross. (2005). Customary International Humanitarian Law: Volume I, Rules. Rule 7: The Principle of Distinction between Civilian Objects and Military Objectives. In: Cambridge University Press. Retrieved from https://ihl-databases.icrc.org/customary-ihl/eng/docs/v1 rul rule7

<sup>76</sup> Ibid., Rule 8.

<sup>77</sup> International Committee of the Red Cross. (1977). Protocol Additional to the Geneva Conventions of 12 August 1949, and relating to the Protection of Victims of International Armed Conflicts (Protocol I), Article 48. Retrieved from https://ihl-databases.icrc.org/ihl/INTRO/470

<sup>78 &</sup>quot;The general principle of distinction entails that parties to an armed conflict must at all times distinguish between civilian objects and military objectives. Attacks may only be directed against military objectives, while civilian objects are protected against attack unless and for such time as they become military objectives. This principle has been recognized as a fundamental norm of customary international humanitarian law." —International Criminal Tribunal for the Former Yugoslavia. (1997). Prosecutor v. Duško Tadić, Opinion and Judgment, Case No. IT-94-1-T, Trial Chamber, 7 May 1997, para. 120. Retrieved from https://www.icty.org/x/cases/tadic/tjug/en/tad-tsj70507JT2-e.pdf

<sup>79 &</sup>quot;The Chamber finds that the attacks directed against the church, the hospital, and the school buildings, which were civilian objects at the time, constituted war crimes under Article 8(2)(b)(ii) of the Rome Statute. These attacks were not justified by military necessity, and the accused knew or should have known that these were civilian objects entitled to protection under international humanitarian law." –International Criminal Court. (2019). The Prosecutor v. Bosco Ntaganda, Judgment, Case No. ICC-01/04-02/06, 8 July 2019, para. 1173. Retrieved from https://www.icc-cpi.int/CourtRecords/CR2019\_03568.pdf

#### 3.2.2 Hezbollah's Social, Health, and Religious Infrastructure

On March 27, 2024, an Israeli airstrike targeted a paramedic center affiliated with Hezbollah in Hebbariye, southern Lebanon, resulting in the deaths of seven volunteer paramedics. The Lebanese Ministry of Health condemned the attack. Subsequent Israeli strikes in Tayr Harfa and Naqoura led to additional casualties among paramedics from the Islamic Health Society and the Amal Movement-affiliated Islamic Risala Scout Association.<sup>80</sup>

On September 27, 2024, the Israeli Air Force conducted a massive airstrike targeting Hezbollah's main command center in the Dahieh suburb of Beirut. The operation aimed to eliminate Hezbollah's leader, Hassan Nasrallah, who was present at the underground facility during the strike. The final death toll of this attack, which killed Hassan Nasrallah and at least five persons present with him, could not be immediately estimated, given at least six full housing complexes were fully destroyed in its close vicinity. The airstrike additionally caused substantial damage to the surrounding area, destroying multiple residential buildings and leading to civilian casualties. This event marked a pivotal escalation in the ongoing conflict between Israel and Hezbollah, with a significant rise in hostilities in the following period.

As previously mentioned and according to Article 52(2) of Additional Protocol I, civilian objects can lose their protected status if they are used for military purposes: "In so far as objects are concerned, military objectives are limited to those objects which by their nature, location, purpose or use make an effective contribution to military action and whose total or partial destruction, capture or neutralization, in the circumstances ruling at the time, offers a definite military advantage."<sup>82</sup>

Thus, the command center where the Secretary General of Hezbollah was present during the attack can be considered a lawful target under IHL, despite being buried underneath a residential area. That said, the proportionality of the attack comes into question, and must be applied, as per Article 51(5)(b) of Additional Protocol, especially given the extent and scope of the damage and the fact that the number of civilian casualties is still unknown.

#### 3.2.3 Targeting Al-Qard Al-Hasan

During the war with Hezbollah, Israel had targeted Hezbollah's financial facility, Qard Al-Hassan (AQAH), multiple times in different branches. In October 2024, Israeli airstrikes destroyed several branches of AQAH in Beirut's southern suburbs military, during intensified attacks on Lebanon. The IDF justified these attacks by asserting that Al-Qard al-Hassan functions as Hezbollah's financial arm, facilitating the group's military activities. The destruction of these branches led to significant civilian displacement as residents fled the targeted neighborhoods.<sup>83</sup>

<sup>80</sup> NY1. (2024, March 27). 7 Lebanese and an Israeli killed in an exchange of fire along the Lebanon-Israel border. Retrieved from https://ny1.com/nyc/all-boroughs/ap-top-news/2024/03/27/7-lebanese-and-an-israeli-killed-in-an-exchange-of-fire-along-the-lebanon-israel-border

<sup>81</sup> NPR. (2024, September 27). Israel strikes Hezbollah's headquarters in Beirut, Lebanon. Retrieved from https://www.npr. org/2024/09/27/nx-s1-5131238/israel-strikes-hezbollah-headquarters-beirut-lebanon

<sup>82</sup> Previously cited.

<sup>83</sup> This is Lebanon. (2024, October 21). "اليل جهنمي" في بيروت.. غارات جنونية تضرب "القرض الحسن" وتدمر المناطق اللبنانية ("Hellish Night" in Beirut: Insane Airstrikes Hit al-Qard al-Hassan Bank, Devastating Lebanese Regions]. Retrieved from https://www.thisislebanon.com/lebanon/409286/

Following these events, on October 23, the IDF issued evacuation warnings to residents in parts of Tyre, a city in southern Lebanon. Subsequently, Israeli airstrikes hit multiple locations in Tyre, including a residential complex, the al-Chadid company, a branch of AQAH, a center of the Islamic Health Committee (Hezbollah's civil defense), and an old municipal building. These strikes resulted in substantial property damage and further civilian evacuations.<sup>84</sup>

Therefore, the discussion is whether AQAH is a legitimate target. On one hand, the Israeli government contends that targeting AQAH is a strategic move to disrupt Hezbollah's financial infrastructure, aiming to weaken its military capabilities. On the other hand, at face value, AQAH operates as a financial institution, primarily providing microloans and financial services to regular citizens. It also offers loans for education, healthcare, and small businesses, activities aligned with a civilian economic entity rather than a military facility.

In 2021, the U.S. Department of the Treasury sanctioned AQAH, claiming it acts as Hezbollah's "financial arm" and facilitates money transfers for Hezbollah's operations. <sup>85</sup> Yet, it is unclear from the evidence available to the research team whether or not AQAH is funding Hezbollah's military activities; if any were found, it could be argued that it is making an effective contribution to military action. In IHL, "an object makes an effective contribution to military action if it plays a role in supporting, enabling, or enhancing military activities. Dual-use objects, such as roads, bridges, and financial institutions, must be assessed based on their actual use in the conflict before being lawfully targeted." <sup>86</sup>

Digging deeper, unlike other Lebanese banks, AQAH operates outside Lebanon's formal financial system and is allegedly used by Hezbollah as a way to circumvent banking restrictions. If AQAH's financial resources are being used to purchase weapons, fund combat operations, or sustain Hezbollah's armed forces, its targeting could be justified under IHL. Hence, whether AQAH is a legitimate target depends on clear evidence that it is directly contributing to Hezbollah's military operations. If it is merely providing civilian financial services, targeting it would violate IHL and constitute an unlawful attack on civilian infrastructure. However, if AQAH directly funds or facilitates military activities, it could be lawfully targeted, provided that the attack is proportionate and precautionary measures are taken; until this is proven, everything else is speculations and means that Israel's attacks on the facility constitute IHL violations.

#### 3.2.4 Refugee Camps

#### Legal Framework

In addition to the above protections that refugees benefit from as civilians, and the protection of refugee camps as civilian objects, attacking a refugee camp violates the fundamental principle of distinction under Article 48 of Additional Protocol I, which mandates that combatants distinguish

<sup>84</sup> IMLebanon. (2024, October 23). كفركل ألعسن في كفركل [Bombing of the al-Qard al-Hassan building in Kfar Kela]. Retrieved from https://www.imlebanon.org/2024/10/23/kard-elhasan34/

<sup>85</sup> U.S. Department of the Treasury. (2021, May 11). Treasury Targets Hizballah Finance Official and Shadow Bankers in Lebanon. Retrieved from https://home.treasury.gov/news/press-releases/jy0170

<sup>86</sup> International Committee of the Red Cross. (1987). Commentary on the Additional Protocols of 8 June 1977 to the Geneva Conventions of 12 August 1949. Retrieved from https://ihl-databases.icrc.org/ihl/COM/470-750065?OpenDocument

between military and civilian objects at all times. Additionally, the 1951 Refugee Convention<sup>87</sup> and its 1967 Protocol provide legal protections to refugees, affirming the principle of nonrefoulement in Article 33, which prohibits forcibly returning refugees to life-threatening conditions.<sup>88</sup> While the convention does not explicitly address armed conflicts, it reinforces refugees' right to safety and dignity.

Additionally, the UN Security Council Resolution 1674 (2006) on the Protection of Civilians in Armed Conflict recognizes that refugees and internally displaced persons (IDPs) are particularly vulnerable and calls on all parties to respect their safety and rights.<sup>89</sup> Yet, like any other civilian object, Refugee camps retain their civilian status unless they are used for military purposes, such as sheltering combatants, storing weapons, or serving as operational bases.

#### Violations during the 2024 War

During the 2023–2024 period, Israeli military actions targeted multiple refugee camps across Lebanon, leading to significant civilian casualties and displacement. The escalation of hostilities has underscored the vulnerability of Palestinian displaced communities in Lebanon, with calls for immediate international intervention to prevent further civilian harm. On October 1, 2024, Israeli airstrikes hit Ain el-Hilweh, Lebanon's largest Palestinian refugee camp near Sidon, allegedly targeting Munir al-Maqdah, an official with the Al-Aqsa Martyrs' Brigades. 90

Less than a week later, on October 7, 2024, the United Nations Relief and Works Agency for Palestine Refugees in the Near East (UNRWA) reported that Israeli airstrikes affected three additional refugee camps — Ain el-Hilweh, El Bass in Tyre, and Beddawi near Tripoli—further exacerbating the humanitarian crisis. <sup>91</sup> In northern Lebanon, an October 5, 2024 Israeli strike on a refugee camp resulted in the death of Hamas official Saeed Atallah Ali and his family, raising concerns about attacks on civilians within densely populated areas. <sup>92</sup>

As the conflict escalated, Israeli airstrikes also struck Burj al-Barajneh, a Palestinian refugee camp in Beirut's southern suburbs, on October 11, 2024, causing extensive damage and prompting mass evacuations.<sup>93</sup> On the same day, airstrikes hit Rashidieh Refugee Camp near Tyre, with UNRWA reporting widespread displacement among the camp's residents.<sup>94</sup> These acts of

<sup>87</sup> United Nations. (1951). Convention relating to the Status of Refugees. Retrieved from https://www.unhcr.org/1951-refugee-convention.html

<sup>88</sup> Ibid., Article 33.

<sup>89</sup> United Nations Security Council. (2006, April 28). Resolution 1674 (2006) [on protection of civilians in armed conflict]. S/RES/1674. Retrieved from https://undocs.org/S/RES/1674(2006)

<sup>90</sup> Al Jazeera. (2024, October 1). Why did Israel attack Lebanon's biggest Palestinian refugee camp? . Retrieved from https://www.aljazeera.com/news/2024/10/1/why-did-israel-attack-lebanons-biggest-palestinian-refugee-camp

<sup>91</sup> United Nations Relief and Works Agency for Palestine Refugees in the Near East (UNRWA). (2024, October 8). UNRWA Situation Report #5 on the Lebanon Emergency Response. Retrieved from https://www.unrwa.org/resources/reports/unrwa-situation-report-5-lebanon-emergency-response

<sup>92</sup> Associated Press. (2024, October 5). Middle East latest: Two Hamas officials killed in Israeli strikes in Lebanon. Retrieved from https://apnews.com/article/israel-hezbollah-hamas-latest-mideast-5-october-2024-e8c20151ce6d01f8ac697a835314e70d

<sup>93</sup> Reuters. (2024, October 11). UNRWA chief says many Palestinians camps in Lebanon empty after Israeli strikes. Retrieved from https://www.reuters.com/world/middle-east/unrwa-chief-says-many-palestinians-camps-lebanon-empty-after-israeli-strikes-2024-10-11/

<sup>94</sup> Reuters. (2024, October 11). UNRWA chief says many Palestinian camps in Lebanon empty after Israeli strikes. Retrieved from https://www.reuters.com/world/middle-east/unrwa-chief-says-many-palestinians-camps-lebanon-empty-after-israeli-strikes-2024-10-11/

hostilities have drawn condemnation from humanitarian organizations and raised pressing concerns regarding the safety and protection of civilians in refugee camps, which are considered protected spaces under IHL.

3.3 Targeting personnel, installations, material, units or vehicles involved in a humanitarian assistance or peacekeeping mission in accordance with the Charter of the United Nations, as long as they are entitled to the protection given to civilians or civilian objects under the international law of armed conflict

#### 3.3.1 Legal Framework

IHL unequivocally prohibits the intentional targeting of personnel, installations, materials, units, or vehicles involved in humanitarian assistance or peacekeeping missions conducted under the Charter of the United Nations, provided these entities maintain their civilian or non-combatant status. <sup>95</sup> This prohibition, enshrined in Article 8(2)(b)(iii) of the Rome Statute of the International Criminal Court, defines such actions as war crimes.

The Geneva Conventions (1949) and Additional Protocol I (1977) further solidify these protections, mandating the safety and immunity of individuals and facilities dedicated to relief and peacekeeping operations. Under customary international humanitarian law, rules congregated by the International Committee of the Red Cross, including Rules 31 & 33, reaffirm the imperative to protect humanitarian personnel and objects from attack unless they directly participate in hostilities.

The 1994 Convention on the Safety of United Nations and Associated Personnel,<sup>96</sup> supplemented by its 2005 Optional Protocol,<sup>97</sup> also criminalizes deliberate attacks on UN personnel engaged in peacekeeping or humanitarian missions. These instruments collectively emphasize the principles of distinction, proportionality, and necessity, underscoring the severe illegality of attacks against non-combatant entities.

On the other hand, humanitarian personnel must adhere to strict principles and standards to ensure their protection and maintain the integrity of their work. They are required to respect the core humanitarian principles of neutrality, impartiality, independence, and humanity, avoiding actions or behaviors that could compromise their safety or the perception of their mission.<sup>98</sup> This includes refraining from political, military, or biased activities that might align

<sup>95</sup> International Committee of the Red Cross. (n.d.). Rule 30. Protection of Humanitarian Relief Personnel. Retrieved from https://ihl-databases.icrc.org/ar/customary-ihl/v2/rule30 (accessed 04.01.25)

<sup>96</sup> United Nations. (n.d.). Convention on the Safety of United Nations and Associated Personnel. Retrieved from https://www.un.org/law/cod/safety.htm (accessed 04.01.25)

<sup>97</sup> United Nations. (1994). Convention on the Safety of United Nations and Associated Personnel. Retrieved from https://treaties.un.org/doc/source/recenttexts/xviii-8a\_english.pdf (accessed 04.01.25)

<sup>98</sup> International Federation of Red Cross and Red Crescent Societies. (n.d.). The Fundamental Principles of the International Red Cross and Red Crescent Movement. Retrieved from https://www.ifrc.org

them with any party to the conflict. They must strictly follow organizational codes of conduct, ensuring their actions are ethical, culturally sensitive, and respectful of local laws and customs. Maintaining transparency and accountability in their work is essential to building trust with communities and conflict parties. Additionally, they are expected to responsibly use symbols and emblems like the Red Cross or UN insignia, as misuse can jeopardize their protection under international law. 100

During the 2023/2024 Hezbollah-Israel conflict, documented incidents revealed egregious violations of these legal standards, with both parties engaging in actions that endangered humanitarian workers and peacekeepers. These attacks not only undermined international law but also raised significant concerns about the deliberate targeting of entities protected under IHL.

#### 3.3.2 Attacks on Humanitarian & Medical Personnel & Facilities

For instance, the Lebanese Red Cross (LRC) reported several breaches of IHL during its relief operations in South Lebanon. On October 13, an LRC team was bombed during a search for victims, with the site struck a second time, injuring volunteers. Similar incidents occurred on October 16<sup>102</sup> and October 22, where sites being searched by LRC personnel were targeted again, causing injuries to multiple volunteers. On October 23, an LRC ambulance was directly targeted, resulting in minor injuries to one volunteer and damage to two ambulances, with the complete incapacitation of another vehicle<sup>104</sup>. Such incidents blatantly violated IHL principles that protect medical personnel and transport, including those marked with the distinctive emblems of the Geneva Conventions, from any direct attack.

These incidents were followed by escalating attacks on humanitarian and healthcare facilities, further exacerbating the dire situation for affected populations. On November 17, Israeli airstrikes targeted civil defense facilities and an Islamic Health Organization hospital, causing severe structural damage, the destruction of essential medical equipment, and a halt to critical emergency services. Further strikes on Lebanon's healthcare system were reported, including bombings in Beirut's southern suburbs and other medical facilities, resulting in

<sup>99</sup> CHS Alliance. (2014). Core Humanitarian Standard on Quality and Accountability. Retrieved from https://corehumanitarianstandard.org

<sup>100</sup> International Committee of the Red Cross. (1949). Geneva Conventions of 12 August 1949. Retrieved from https://ihl-databases.icrc.org/; United Nations. (1994). Convention on the Safety of United Nations and Associated Personnel. Retrieved from https://treaties.un.org/doc/source/recenttexts/xviii-8a english.pdf

<sup>101</sup> MTV Lebanon. (2024, October 13). Red Cross teams face assault. Retrieved from https://www.mtv.com.lb/en/News/Local/1500713/photos--red-cross-teams-face-assault (accessed 04.01.25)

<sup>102</sup> Lebanese Red Cross. (2024, October 16). Lebanese Red Cross on X. Retrieved from https://x.com/RedCrossLebanon/status/1846565940927820003?t=-OhCwcZID3Q8UKrLR1Eh5A&s=08 (accessed 04.01.25)

<sup>103</sup> Lebanon24. (2024, October 22). Red Cross: 3 paramedics injured during rescue operation in Nabatieh. Retrieved from https://shorturl.at/fkzH7 (accessed 04.01.25)

<sup>104</sup> Lebanese Red Cross. (2024, October 23). Lebanese Red Cross on X. Retrieved January 4, 2025, from https://x.com/RedCrossLebanon/status/1849100987820093621

<sup>105</sup> LBC Group. (2024, November 17). Israeli airstrikes target civil defense and Islamic Health Organization hospital. Retrieved from https://www.lbcgroup.tv/news/lebanon-news/811536/israeli-airstrikes-target-civil-defense-and-islamic-health-organizatio/en (accessed 04.01.25)

the destruction of infrastructure critical for civilian survival during the conflict. <sup>106</sup> These attacks led to significant casualties, forced evacuations of healthcare staff and patients, and long-term disruptions in health service delivery. Indeed, the WHO reported that Israeli attacks on Lebanon, as of November 21, 2024, there have been 137 attacks on healthcare in Lebanon, resulting in 226 deaths and 199 injuries among health workers and patients. Notably, 47% of these attacks—65 out of 137—have been fatal, a higher proportion than in any other active conflict worldwide during that period. <sup>107</sup> In addition, the Lebanese health ministry reported that, as of November 1, 2024, Israeli military operations had affected 40 hospitals, 84 medical and ambulance centers, and a total of 243 medical facilities, leading to the deaths of at least 178 medical staff members since October 2023. <sup>108</sup>

On the other hand, Israeli forces have accused Hezbollah of utilizing vehicles belonging to the Islamic Health Organization to transport weapons and combatants. For instance, the IDF Arabic Spokesperson, Avichay Adraee, stated that Hezbollah and the Shi'ite Amal movement use IHO ambulances to move forces and weapons in southern Lebanon. While these allegations are challenging to verify independently, reports have surfaced suggesting that the IHO, a healthcare entity closely linked to Hezbollah, serves as Hezbollah's "Medical Corps," operating under the guise of a civilian organization. Additionally, the Islamic Health Committee, affiliated with Hezbollah, has been in addition to providing emergency medical and rescue services, allegedly accused of being involved in military acts and transporting combatants from and to the South, further blurring the lines between humanitarian activities and military affiliation. Such allegations, if proven true, compromise the neutrality of the IHO, potentially endangering genuine humanitarian efforts and violating international humanitarian law, which mandates the protection of medical personnel and transport from directly engaging in any activity directly supporting armed hostilities.

#### 3.3.3 Attacks on Peacekeepers

During armed conflicts, members of military units taking part in a peace operation and not actively engaged in armed confrontations are also considered protected categories as long as this situation remains unchanged. The United Nations Interim Force in Lebanon (UNIFIL) endured numerous assaults from the Israeli Defense Forces (IDF) and Hezbollah during the conflict, jeopardizing the safety and integrity of its mission. Furthermore, despite UNIFIL's strictly non-combatant status and mandate under the UN Charter, IDF and Hezbollah-affiliated forces engaged in actions that placed UNIFIL personnel at direct risk.

<sup>106</sup> L'Orient-Today. (2024, November 17). After calls to evacuate Ghobeiri and Choueifat, Israeli aircraft strike Beirut's southern suburbs. Retrieved from https://today.lorientlejour.com/article/1435472 (accessed 04.01.25)

<sup>107</sup> World Health Organization. (2024, November 22). Lebanon: A conflict particularly destructive to health care. Retrieved from https://www.who.int/news/item/22-11-2024-lebanon--a-conflict-particularly-destructive-to-health-care

<sup>108</sup> Associated Press. (2024, November 22). Health workers in Lebanon describe deadly Israeli attacks on colleagues and fear more. Retrieved from https://apnews.com/article/lebanon-israel-medics-hezbollah-hospitals-6c7f75c921c9deec0fa5c160ce639664

<sup>109</sup> Adraee, A. (n.d.). IDF Arabic Spokesperson: Hezbollah and Amal movement use Islamic Health Organization ambulances. Retrieved from https://www.ynetnews.com/article/s1orskocp (accessed 04.01.25)

<sup>110</sup> Ynetnews. (n.d.). Islamic Health Organization serves as Hezbollah's "Medical Corps". Retrieved from https://www.ynetnews.com/article/s1jrvbkyje (accessed 04.01.25)

<sup>111</sup> Human Rights Watch. (2024, October 30). Lebanon: Israeli attacks on medics apparent war crimes. Retrieved from https://www.hrw.org/news/2024/10/30/lebanon-israeli-attacks-medics-apparent-war-crimes (accessed 04.01.25)

<sup>112</sup> Customary IHL - Rule 33. Personnel and Objects Involved in a Peacekeeping Mission

On October 7, the UNIFIL issued a statement expressing deep concern "by recent activities by the IDF immediately adjacent to the Mission's position. [...] The IDF has been repeatedly informed of this ongoing situation through regular channels. This is an extremely dangerous development. It is unacceptable to compromise the safety of UN peacekeepers carrying out their Security Council-mandated tasks." Three days later, Israel targeted a UNIFIL guard tower at its headquarters in Ras al-Naqoura, and two peacekeepers were injured. The next day, the Israeli army targeted the main entrance to the UNIFIL command center in Naqoura, leading to the injury of another two UNIFIL personnel. If A fifth peacekeeper was also wounded later that day due to military activity very close to the UNIFIL center. The UNIFIL further reported that 15 of its peacekeepers suffered from health problems due to smoke exposure from close-by Israeli strikes.

Following these incidents, thirty-four states contributing to the UNIFIL troops issued a joint statement on October 14 condemning these attacks and calling for respect for the safety of UNIFIL personnel. However, two days later, the UNIFIL released a statement stating that they observed the Israeli army directly and deliberately firing towards them. On October 22, peacekeepers were observing Israeli soldiers carrying out operations on Lebanese territory. A UNIFIL statement detailed: "When the soldiers noticed that they were being watched, they opened fire at the position, and UNIFIL withdrew to avoid being hit. The next day, a medical facility at a UNIFIL position in Beit Lif was hit by a shell or rocket from an unknown source, causing damage to the premises. Later, two shells or rockets from an unknown source also landed near a UNIFIL position in Kafr Shuba, causing damage to accommodation and shelters."

These violations were not limited to the Israeli Army. On October 29, the UNIFIL said that Hezbollah, or an affiliated group, likely fired a rocket that hit its headquarters in Naqoura. Among those affected were eight Austrian peacekeepers, who sustained injuries ranging from minor to moderate due to the impact of the rocket. According to Austria's defense ministry, the injured personnel were treated on-site and did not require evacuation. Indeed, Hezbollah has had longstanding issues with UNIFIL, rooted in the force's mandate under UNSCR 1701,

<sup>113</sup> MTV Lebanon. (2024, October 7). UNIFIL Concerned Over Israeli Activities Near Peacekeeping Mission. Retrieved from https://www.mtv.com.lb/en/News/Local/1497413/unifil-concerned-over-israeli-activities-near-peacekeeping-mission

<sup>114</sup> MTV Lebanon. (2024, October 10). UNIFIL: A serious violation of international humanitarian law and Resolution 1701. Retrieved from https://www.mtv.com.lb/en/News/Local/1499335/unifil--a-serious-violation-of-international-humanitarian-law-and-resolution-1701

<sup>115</sup> Lebanon Debate. (2024, October 11). The command center was targeted... a new Israeli targeting of UNIFIL. Retrieved from https://www.lebanondebate.com/news/668533

<sup>116</sup> This is Lebanon. (2024, October 12). UNIFIL reports soldier injured in southern Lebanon. Retrieved from https://www.thisislebanon.com/lebanon/402587/

<sup>117</sup> This is Lebanon. (2024, October 13). "Tanks destroyed the main gate"... UNIFIL: Israel crossed the Blue Line into Lebanon. Retrieved from https://www.thisislebanon.com/lebanon/403510/

<sup>118</sup> MTV Lebanon. (2024, October 13). 34 nations contributing troops to UNFIL issue statement condemning attacks. Retrieved from https://www.mtv.com.lb/en/News/Local/1500767/34-nations-contributing-troops-to-unfil-issue-statement-condemning-attacks

<sup>119</sup> UNIFIL. (2024, October 16). UNIFIL statement (16 October 2024). Retrieved from https://unifil.unmissions.org/unifil-statement-16-october-2024

<sup>120</sup> IM Lebanon. (2024, October 25). A new attack on UNIFIL... and the latter: We will continue our missions. Retrieved from https://www.imlebanon.org/2024/10/25/unifil-63/

<sup>121</sup> Al Arabiya News. (2024, October 29). UNIFIL says rocket that hit HQ in Naqoura likely fired by Hezbollah or affiliated group. Retrieved from https://english.alarabiya.net/News/middle-east/2024/10/29/austria-says-eight-of-its-unifil-troops-in-lebanon-injured-in-rocket-attack

which includes monitoring and reporting violations of the ceasefire and facilitating the disarmament of non-state armed groups. <sup>122</sup> This mandate has been directly challenging Hezbollah's operational freedom and military presence in southern Lebanon, leading to persistent tensions.

Prior to the October 7th attack in 2023, Hezbollah criticized UNIFIL's operations, accusing the mission of violating Lebanese sovereignty by expanding patrols without prior coordination with local authorities. <sup>123</sup> This rhetoric often translates into actions, as seen in numerous incidents where UNIFIL patrols have faced hostility from local communities influenced by Hezbollah, including stone-throwing, blockades, and restricted access to operational zones.

UN Secretary-General Antonio Guterres strongly condemned the attacks against UNIFIL: "The Secretary-General reiterates that UNIFIL personnel and its premises must never be targeted. Attacks against peacekeepers are in breach of international law, including international humanitarian law. They may constitute a war crime." <sup>124</sup> Initial reports indicate that these attacks may amount to war crimes, intentionally directing attacks on peacekeepers. Even if the bombing was accidental, Israel and Hezbollah have still breached their obligations under IHL as to avoiding any direct targeting of peacekeeping personnel.

3.4 Launching an attack in the knowledge that such an attack will cause severe damage to the natural environment which would be clearly excessive in relation to the concrete and direct overall military advantage anticipated and employing weapons, projectiles and material and methods of warfare which are of a nature to cause superfluous injury or unnecessary suffering

## 3.4.1 Legal Framework

IHL prohibits to "employ methods or means of warfare which are intended, or may be expected, to cause widespread, long-term, and severe damage to the natural environment" (Article 35-3 of API), stipulating that "care shall be taken in warfare to protect the natural environment against widespread, long-term, and severe damage. This protection includes the prohibition of the use of methods or means of warfare which are intended or may be expected to cause such damage to the natural environment and thereby to prejudice the health or survival of the population" (Article 55-1 of API). Additionally, Protocol III of the Convention prohibits the use of this incendiary weapon against civilians on Certain Conventional Weapons.

<sup>122</sup> New Arab. (2023, September). UNIFIL between Hezbollah and the international community. Retrieved from https://www.newarab.com/analysis/unifil-between-hezbollah-and-international-community (accessed 04.01.25)

<sup>123</sup> Atlantic Council. (2023, September). Hezbollah's posture on UNIFIL and Israel. Retrieved from https://www.atlanticcouncil.org/blogs/menasource/hezbollahs-posture-unifil-israel/ and. Al-Manar. (2023, July 12). Nasrallah: We will not accept any violation of our sovereignty. Retrieved from https://english.almanar.com.lb/tag/nasrallah

<sup>124</sup> UN Secretary General. (2024, October 13). Statement attributable to the Spokesperson for the Secretary-General – on the United Nations Interim Force in Lebanon. Retrieved from https://www.un.org/sg/en/content/sg/statement/2024-10-13/statement-attributable-the-spokesperson-for-the-secretary-general-%E2%80%93-the-united-nations-interim-force-lebanon

Despite Israel not being party to any of these instruments, customary IHL considers that the general rules of IHL on the conduct of hostilities "apply to the natural environment" (Rule 43), clearly stating that "no part of the natural environment may be attacked" unless required by imperative military necessity. Furthermore, Rule 45 of IHL customary rules clearly stipulates that the "destruction of the natural environment may not be used as a weapon".

## 3.4.2 Violations during the 2024 War

The 2024 Israeli war on Lebanon has caused extensive environmental destruction, particularly in the southern regions. The conflict, which has persisted for over a year, has not only devastated human lives and infrastructure but has also inflicted irreversible damage on Lebanon's natural ecosystems, agricultural lands, and water resources.

One of the most catastrophic environmental consequences has been the widespread wildfires triggered by airstrikes and incendiary weapons. According to satellite analysis, wildfires in southern Lebanon have burned over 10,800 hectares, an area four times larger than Beirut and ten times the annual average. The southern governorates of Nabatieh and South Lebanon have been disproportionately affected, with fires consuming vast swathes of shrubland, grassland, and forests along the 120km border. 126

Additionally, reports indicated that 195 verified incidents of white phosphorus use were documented across southern Lebanon, particularly in villages like Meiss El Jabal, Kfar Kila, and Houla. This has led to burning at least 2,000 hectares of agricultural and forested land, significantly impacting Lebanon's biodiversity. Additionally, the Lebanese Ministry of Agriculture has reported that white phosphorus attacks have destroyed over 1250 hectares of land. In Millages along the frontlines, trees were either destroyed, their fruit was shed prematurely, or they became inaccessible due to the conflict. This has resulted in a significant economic loss, as Lebanon exported over \$30 million worth of olive oil in 2016.

The war has also severely impacted Lebanon's water resources. Water contamination has become a critical issue due to the destruction of irrigation networks, reservoirs, and underground water tables. Reports indicate that toxic chemicals from Israeli munitions, including phosphorus and lead, have seeped into the soil and water supplies, exacerbating Lebanon's ongoing water crisis.<sup>131</sup>

<sup>125</sup> Jaafar, H. (2024, November 4). The 2024 Israeli War on Lebanon: A Devastating Blow to Agriculture and the Environment. American University of Beirut - Faculty of Agricultural and Food Sciences. Retrieved from https://www.aub.edu.lb/fafs/news/Pages/2024 The-2024-Israeli-War-on-Lebanon-A-Devastating-Blow-to-Agriculture-and-the-Environment.aspx

<sup>126</sup> CEOBS. (2025, January 21). Scoping conflict-linked environmental harm in southern Lebanon. Retrieved from https://reliefweb. int/report/lebanon/scoping-conflict-linked-environmental-harm-southern-lebanon

<sup>127</sup> Ibid.

<sup>128</sup> Ibid.

<sup>129</sup> MTV Lebanon. (2024, November 14). ياسين: الفوسفور دمّر 1250 هكتاراً من الأراضي الزراعية (Yassin: Phosphorus destroyed 1,250 hectares of agricultural land]. Retrieved from https://www.mtv.com.lb/News/-هكتارا--/1453513/ياسين---الفوسفور--دم-ر-1250-هكتارا--/الأراضي-الزراعية

<sup>130</sup> Abou Said, S. (2024, December 15). Scorched olive trees and poisoned water: What is the environmental cost of war in Lebanon? Retrieved from https://www.euronews.com/green/2024/12/15/scorched-olive-trees-and-poisoned-water-what-is-the-environmental-cost-of-war-in-lebanon

<sup>131</sup> Ibid.

Groundwater pollution has been particularly alarming in areas where phosphorus munitions were used, as rainfall has carried pollutants deeper into water reserves.<sup>132</sup>

The damage to irrigation infrastructure has further jeopardized food security. In the Beqaa Valley, where much of Lebanon's cereal production takes place, disruptions have led to reduced planting of essential crops such as wheat and potatoes. The destruction of polyethylene irrigation pipes has rendered vast tracts of farmland unusable.<sup>133</sup>

Finally, the World Bank estimates that the conflict has caused \$221 million in environmental damage, including land degradation and pollution.<sup>134</sup> The agricultural sector alone has suffered over \$1.1 billion in losses due to crop destruction and farmer displacement.<sup>135</sup>

As Israel massively resorted to use of white phosphorous and other incendiary munitions, in addition to the widespread bombings devastating fields of tobacco, citrus, and olives, it failed to provide any evidence as to the imperative and necessary nature of such attacks. The indiscriminate nature of such attacks was denounced by Human Rights Watch in a report as early as October 2023,<sup>136</sup> showing the systematic use of such unlawful means and methods in conducting hostilities by Israel.

The table below presents some of the recorded violations of usage of white phosphorus and other chemical weapons prohibited under IHL from October 2023 till December 2024 and recorded in different areas in Lebanon, mainly southern Lebanon and Beirut Suburbs.

<sup>132</sup> Jaafar, H. (2024, November 4). The 2024 Israeli War on Lebanon: A Devastating Blow to Agriculture and the Environment. American University of Beirut - Faculty of Agricultural and Food Sciences. Retrieved from https://www.aub.edu.lb/fafs/news/Pages/2024\_The-2024-Israeli-War-on-Lebanon-A-Devastating-Blow-to-Agriculture-and-the-Environment.aspx
133 Ibid.

<sup>134</sup> CEOBS. (2025, January 21). Scoping conflict-linked environmental harm in southern Lebanon. Retrieved from https://reliefweb.int/report/lebanon/scoping-conflict-linked-environmental-harm-southern-lebanon

<sup>135</sup> Tanios, C. (2024, November 14). Israel-Hezbollah conflict cost Lebanon \$8.5 billion, World Bank says. Retrieved from https://www.reuters.com/world/middle-east/israel-hezbollah-conflict-cost-lebanon-85-billion-world-bank-says-2024-11-14/

<sup>136</sup> Human Rights Watch (2023, October 12). Israel: White Phosphorus Used in Gaza, Lebanon, Use in Populated Areas Poses Grave Risks to Civilians. Retrieved from https://www.hrw.org/news/2023/10/12/israel-white-phosphorus-used-gaza-lebanon

Date	Location	Event		
November 19, 2024	Southern Lebanon Areas	Israeli forces bombard with phosphorus the outskirts of Zabqin, Al-Qalila, and Majdal Zoun in an attempt to advance towards Al-Bayyada. <sup>137</sup>		
November 9, 2024	Beirut	Pungent odors emanate from the sites of Israeli raids on the southern suburbs of Beirut. Eyewitnesses confirmed the emission of strong odors after an Israeli raid targeting the southern suburbs of Beirut, which appeared to be caused by the use of chemicals or phosphorus in the bombing. <sup>138</sup>		
October 18, 2024	Naqoura	UNIFIL also said it found evidence of possible use of white phosphorus weapons near one of its bases. 139		
October 3, 2024	Beirut	Israel used internationally banned phosphorus bombs during its targeting of the Bachoura area in the heart of the capital, Beirut, according to the Ministry of Health. 140		
September 11, 2024	Khiyam	Israeli enemy forces on Wednesday targeted the southern area of south Lebanon's Khiyam with phosphorus shelling. 141		
August 22, 2024	Wadi Hamoul	A large fire broke out in Wadi Hamoul after being hit by Israeli phosphorus shelling. 142		
August 5, 2024	Talloussa	Israeli shelling targeted the town of Talloussa with phosphorus bombs. 143		

<sup>137</sup> LBC Group. (2024). الوكالة الوطنية للإعلام: القوات الإسرائيلية تقصف بالفوسفور أطراف زيقين (National News Agency: Israeli forces bomb the outskirts of Zebqin with phosphorus]. Retrieved from https://www.lbcgroup.tv/news/latest-news/817299/ الوكالة-الوطنية-للإعلام-القوات-بالفوسفور-أطراف-زيقين

<sup>138</sup> RT Arabic. (2024). مواطنون: روائح قوية تنبعث من أماكن الغارات الإسرائيلية على الضاحية الجنوبية لبيروت [Citizens: Strong odors emanate from Israeli airstrike locations in Beirut's southern suburbs]. Retrieved from https://arabic.rt.com/middle\_east/1617868-مواطنون-روائح--/الجنوبية-المجنوبية-الجنوبية-المجنوبية-المجنوبية-المجنوبية-المجنوبية-المحنوبية-ال

<sup>139</sup> Democracy Now. (2024, October 18). UNIFIL says Israel has used white phosphorus as Israeli military continues to attack its forces. Retrieved from https://www.democracynow.org/2024/10/18/headlines/unifil\_says\_israel\_has\_used\_white\_phosphorus\_as\_israeli\_military\_continues\_to\_attack\_its\_forces

<sup>140</sup> IM Lebanon. (2024, October 3). شبعا تحت النار الإسرائيلية: قصف عنيف وخسائر فادحة [Shebaa under Israeli fire: Heavy shelling and severe losses]. Retrieved from https://www.imlebanon.org/2024/10/03/chaburaa34/

<sup>141</sup> National News Agency (NNA). (2024). Security update: Phosphorus shelling hits south of Lebanon. Retrieved from https://www.nna-leb.gov.lb/en/justice-law/720599/security-update-phosphorus-shelling-hits-south-of

<sup>142</sup> MTV Lebanon. (2024). NNA: A large fire broke out in Wadi Hamoul after being hit by Israeli phosphorus shelling. Retrieved from https://www.mtv.com.lb/en/News/Live-Feed/1474550/nna--a-large-fire-broke-out-in-wadi-hamoul-after-being-hit-by-israeli-phosphorus-shelling

<sup>143</sup> MTV Lebanon. (2024). Israeli shelling targeted the town of Talloussa with phosphorus bombs. Retrieved from https://www.mtv.com.lb/en/News/Live-Feed/1469151/israeli-shelling-targeted-the-town-of-talloussa-with-phosphorus-bombs

July 26, 2024	Rashaya Al Foukhar	Artillery shells were fired on the outskirts of Shebaa and phosphorus shells were used around the area o Rachaya Al Foukhar. <sup>144</sup>	
June 23, 2024	Southern Lebanon (Multiple Areas)	Israeli army artillery targeted the forests of Kafr Hamam and bombed with phosphorus bombs the vicinity of the town of Rashaya Al-Fakhar. <sup>145</sup>	
June 22, 2024	Harat al Wazzani – Kfar Kila	Israeli shelling has targeted Harat al Wazzani and Tallat al-Hamames in Kfar Kila area in South Lebanon. 146	
June 19, 2024	Southern Lebanon (Multiple Areas)	National News Agency correspondent in Marjeyou reported that Israeli enemy phosphorus shelling targets the southern Lebanese town of Kfar Kila and thoutskirts of the town of Adaisseh. 147	
June 15, 2024	Al-Azziyah & Deir Mimes	Civil defense members from the Qlaia and Jdeid Marjeyoun centers and from the Islamic Resala Scou Association, in addition to army and municipali units, participated in firefighting operations following the Israeli bombardment with phosphorus she on Tallat al-Azziya and Deir Mimas in the al-Ha and al-Qseibeh areas. 148	
June 14, 2024	Adaisseh	Adaisseh in the Marjeyoun district are under phosphorus shelling. 149	
June 5, 2024	South Lebanon	Israel illegally used explosive white phosphorus five times over residential areas in southern Lebanon. 150	

MTV Lebanon. (2024). Artillery shells were fired on the outskirts of Shebaa, and phosphorus shells were used around the area of Rachaya Al Foukhar. Retrieved from https://www.mtv.com.lb/en/News/Live-Feed/1465708/artillery-shells-were-fired-on-the-outskirts-of-shebaa--and-phosphorus-shells-were-used-around-the-area-of-rachaya-al-foukhar

<sup>145</sup> This Is Lebanon. (2024). Lebanon: Israeli phosphorus attacks continue to devastate southern villages. Retrieved from https://www.thisislebanon.com/lebanon/342478/

<sup>146</sup> This Is Lebanon. (2024). Widespread fires reported following Israeli phosphorus shelling in Lebanon's border areas. Retrieved from https://www.thisislebanon.com/lebanon/342164/

<sup>147</sup> National News Agency (NNA). (2024). Security update: Hostile phosphorous shelling targets southern Lebanon. Retrieved from https://www.nna-leb.gov.lb/en/justice-law/702593/security-update-hostile-phosphorous-shelling-targe

<sup>148</sup> National News Agency (NNA). (2024). Extinguishing of fires that broke out following Israeli phosphorus shelling in Lebanon. Retrieved from https://www.nna-leb.gov.lb/en/justice-law/701958/extinguishing-of-fires-that-broke-out-following-en

<sup>149</sup> MTV Lebanon. (2024). The outskirts of the town of Adaisseh in the Marjayoun district are under phosphorus shelling. MTV Lebanon. Retrieved from https://www.mtv.com.lb/en/News/Live-Feed/1454494/the-outskirts-of-the-town-of-adaisseh-in-the-marjayoun-district-are-under-phosphorus-shelling

<sup>150</sup> MTV Lebanon. (2024). Human Rights Watch: Israel illegally used explosive white phosphorus five times over residential areas in southern Lebanon. Retrieved from https://www.mtv.com.lb/en/News/Live-Feed/1451782/human-rights-watch--israel-illegally-used-explosive-white-phosphorus-five-times-over-residential-areas-in-southern-lebanon

December 19, 2023	South Lebanon (Multiple areas)	Israeli artillery launched a series of attacks on south Lebanon targeting Wadi Hassan, the outskirts of Jebbayn, Houla, Markaba, and Mays el-Jabal.  The strikes included phosphorus bombing in the western part of Blida, situated between the towns of Blida and Aytaroun. <sup>151</sup>
October 30, 2023	Aita al-Shaab	An Israeli tank shell hit Monday a house in the town of Aita al-Shaab, causing no casualties. The Israeli army also shelled with white phosphorus and flares the Shebaa valley, Halta, Bastra and Kfarshouba after it had fired 12 shells, including white phosphorus bombs, on the outskirts of the Israeli al-Raheb post near the southern town of Aita al-Shaab. 152
October 30, 2023	al-Labbouneh	Israeli warplanes had also targeted at dawn al-Labbouneh, near the southern Lebanese town of Naqoura, and fired 15 shells at al-Musheirifa. <sup>153</sup>
October 17, 2023	Dhayra	At night, the Israeli army launched over 100 white phosphorus shells over Dhayra, resulting in the lower floor of a residential building catching fire. Fortunately, there have been no reported injuries. <sup>154</sup>

3.5 Targeting buildings dedicated to religion, education, art, science or charitable purposes, historic monuments, hospitals, and places where the sick and wounded are collected, provided they are not military objectives

## 3.5.1 Legal Framework

The protection of buildings dedicated to religion, education, art, science, charitable purposes, historic monuments, hospitals, and places where the sick and wounded are collected is a fundamental principle of IHL. The Hague Regulations of 1907, specifically Article 27, state that in sieges and bombardments, all necessary steps must be taken to spare buildings dedicated to

LBC Group. (2024). Israeli artillery strikes multiple areas in South Lebanon using phosphorus. Retrieved from https://www.lbcgroup.tv/news/lebanon-news/742251/israeli-artillery-strikes-multiple-areas-in-south-lebanon-using-phosph/en

<sup>152</sup> Naharnet. (2024). Israel fires 12 shells near Aita al-Shaab. Retrieved from https://www.naharnet.com/stories/en/301251-israel-fires-12-shells-near-aita-al-shaab

<sup>153</sup> Ibid.

LBC Group. (2024). Israeli army launches over 100 white phosphorus shells in South Lebanon. Retrieved from https://www.lbcgroup.tv/news/lebanon-news/728721/israeli-army-launches-over-100-white-phosphorus-sh/en

religion, art, science, and charitable purposes, as well as hospitals, provided they are not used for military purposes.<sup>155</sup> This early codification emphasizes the duty of belligerents to protect cultural and humanitarian assets.

The Geneva Conventions of 1949 and their Additional Protocols of 1977 further expand on these protections. Under Article 18 of the Fourth Geneva Convention, <sup>156</sup> civilian hospitals may not be attacked unless used outside their humanitarian function to commit acts harmful to the enemy. This protection applies on the condition that the facilities are marked and that parties to the conflict are aware of their status. Additional Protocol I, namely Article 53, categorically prohibits acts of hostility directed against historic monuments, works of art, or places of worship that constitute peoples' cultural or spiritual heritage, provided they are not used in support of the military effort. <sup>157</sup> Similarly, Article 56 of Additional Protocol I provides specific protections to works and installations containing dangerous forces, such as dams or nuclear facilities, unless they are being used for military purposes and their destruction is expected to provide a significant military advantage. <sup>158</sup> Furthermore, the 1954 Hague Convention for the Protection of Cultural Property reinforces these protections by addressing the safeguarding and respecting cultural and religious property during armed conflict. <sup>159</sup>

Additionally, customary international humanitarian law (IHL) prohibits attacks against civilian objects, including religious and cultural buildings, and applies universally to all parties in both international and non-international armed conflicts. This prohibition is grounded in Rule 7 of the ICRC Customary IHL Study<sup>160</sup> and codified in Article 52(1) of Additional Protocol I, which states that civilian objects must not be attacked unless used as military objectives.<sup>161</sup>

In addition, these protections are rooted in the principles of distinction, proportionality, and precaution. The principle of distinction obliges parties to differentiate between civilian objects and military objectives. At the same time, proportionality prohibits attacks where incidental harm to civilian objects would be excessive compared to the anticipated military advantage, and precautions must also be taken to minimize damage to such objects.

<sup>155</sup> Hague Convention (IV) Respecting the Laws and Customs of War on Land and its Annex: Regulations concerning the Laws and Customs of War on Land. (1907, October 18). Article 27.

<sup>156</sup> Geneva Convention relative to the Protection of Civilian Persons in Time of War (Fourth Geneva Convention). (1949, August 12). Article 18.

<sup>157</sup> Protocol Additional to the Geneva Conventions of 12 August 1949, and relating to the Protection of Victims of International Armed Conflicts (Protocol I). (1977, June 8). Article 53.

<sup>158</sup> Protocol Additional to the Geneva Conventions of 12 August 1949, and relating to the Protection of Victims of International Armed Conflicts (Protocol I). (1977, June 8). Article 56.

<sup>159</sup> IHL Databases. (1954, May 14). Hague Convention for the Protection of Cultural Property in the Event of Armed Conflict. Retrieved from https://ihl-databases.icrc.org/ihl/INTRO/400

<sup>160</sup> International Committee of the Red Cross (ICRC). (2005). Customary International Humanitarian Law, Volume I: Rules(Rule 7). In: Cambridge University Press. Retrieved from https://ihl-databases.icrc.org/customary-ihl/eng/docs/v1\_cha\_chapter2\_rule7

<sup>161</sup> Protocol Additional to the Geneva Conventions of 12 August 1949, and relating to the Protection of Victims of International Armed Conflicts (Protocol I). (1977, June 8). Article 52(1).

Violations of these principles may constitute war crimes under the Rome Statute of the ICC, as seen in cases like Prosecutor v. Strugar and the Al Mahdi case<sup>162</sup>, where deliberate attacks against cultural property were prosecuted. However, practical challenges, including the misuse of protected buildings for military purposes and limited enforcement mechanisms, hinder full compliance.

Practical challenges significantly undermine the full compliance with IHL concerning protecting religious and cultural buildings during armed conflicts. One major issue is the misuse of protected buildings for military purposes, such as storing weapons, housing combatants, or using them as operational bases. This misuse strips these buildings of their protected status under IHL, making them legitimate military targets. However, this creates a contentious and complex situation where it becomes difficult to ascertain whether such buildings were indeed used for military purposes when they were targeted and destroyed. The destruction of these sites often occurs amid active hostilities, where independent verification is nearly impossible.

## 3.5.2 Targeting Facilities Dedicated to Religion

The table below addresses some of the most prominent attacks on religious facilities in Lebanon, as it highlights recurrent violations of IHL, which mandates the protection of cultural and religious sites during armed conflicts. In numerous instances, Israeli forces have conducted multiple airstrikes that have caused significant damage or destruction of mosques and churches. In some cases, these actions were allegedly justified by claims that the targeted buildings were being used for military purposes, such as storing weapons or hosting operational activities by Hezbollah. While the misuse of religious facilities for military purposes would indeed strip them of their protected status under IHL, the proportionality of these attacks remains questionable. The destruction caused in many of these strikes suggests potential violations of the principle of proportionality, which prohibits attacks where the incidental damage to civilian objects is excessive compared to the anticipated military advantage.

Date	Region	Targeted Building	Attack details/type of violation
November 30, 2024	Southern Lebanon	Mosque	The Israeli army claimed to have found weapons inside a mosque allegedly used by Hezbollah fighters during their operations in the region. <sup>163</sup>
November 25, 2024	Nabatieh	Mosque in Old Serail neighborhood of Nabatieh	An Israeli airstrike targeted the vicinity of a mosque in the Old Serail neighborhood in Nabatieh, resulting in injuries. <sup>164</sup>

<sup>162</sup> General Pavle Strugar was found guilty of war crimes for his role in the shelling of the Old Town of Dubrovnik, a UNESCO World Heritage site, during the 1991 conflict in Croatia. – International Criminal Tribunal for the Former Yugoslavia (ICTY). (2005). Prosecutor v. Strugar, Case No. IT-01-42-T, Judgment. Retrieved from https://www.icty.org/x/cases/strugar/tjug/en/str-tj050131e.pdf

<sup>163</sup> Annahar. (2024, November 30). The Israeli army claims to find weapons inside a mosque used by Hezbollah fighters in southern Lebanon. Retrieved from https://www.annahar.com/Lebanon/175863/-عناصد-على-وسائل-قتالية-داخل-مسجد-استخدمه-/labanon/175863 عناصر-حزب-الله-في-جنوب-لبنان

<sup>164</sup> MTV Lebanon. (2024, November 25). NNA: An airstrike targeted the vicinity of a mosque in the Old Serail neighborhood in Nabatieh, resulting in injuries. Retrieved from https://www.mtv.com.lb/en/News/Live-Feed/1524418/nna--an-airstrike-targeted-the-vicinity-of-a-mosque-in-the-old-serail-neighborhood-in-nabatieh--resulting-in-injuries

November 24, 2024	Nabatieh	Church of Our Lady of Assumption (کنیسة سیدة الانتقال)	An Israeli airstrike destroyed a house in the Christian neighborhood of Nabatieh, causing significant damage to the Church of Our Lady of Assumption and the parish house, as well as nearby homes and vehicles. <sup>165</sup>	
November 20, 2023	Yaroun, southern Lebanon	Saint George Church, a Melkite (Greek) Catholic Church <sup>166</sup>	Israeli army shelled a church in Southern Lebanon, causing damage.	
November 17, 2024	Hadath, Mount Lebanon	Our Lady of Salvation Church (کنیسة سیدة النجاة)	The church sustained significant damage due to Israeli airstrikes targeting nearby civilian buildings. <sup>167</sup>	
November 14, 2024	Southern Lebanon	Unspecified Mosque	The Israeli army demolished a mosque in a border village in southern Lebanon. 168	
November 1, 2024	Dhayra, South Lebanon	Unspecified Mosque	A mosque in the southern town of Dhayra was detonated by the Israeli army, claiming it was used for military purposes. <sup>169</sup>	
October 23, 2024	Southern Lebanon	Unspecified Mosque	The Israeli army reported finding and destroying a weapons cache inside a mosque, allegedly used by Hezbollah, during their operations in the area. (via Avichay Adraaee's Twitter) 170	
October 22, 2024	Dahiyeh (Southern Suburbs of Beirut)	Al-Qaem Mosque	A violent Israeli airstrike targeted the vicinity of Al-Qaem Mosque in Dahiyeh, causing significant damage to the surrounding area. <sup>171</sup>	

<sup>165</sup> This Is Lebanon. (2024, November 24).! أضرار كبيرة في كنيسة بالنبطية [Extensive damage to a church in Nabatieh!]. Retrieved from https://www.thisislebanon.com/lebanon/430619/

<sup>166</sup> Middle East Monitor. (2023, November 20). Israel army shells church in southern Lebanon. Retrieved from https://www.middleeastmonitor.com/20231120-israel-army-shells-church-in-southern-lebanon/

<sup>167</sup> LebanonFiles. (2024, November 17). بالفيديو: أضرارٌ تطال كنيسة سيدة النجاة في الحدت [Damage to Our Lady of Salvation Church in Hadath] . Retrieved from https://www.lebanonfiles.com/articles/

<sup>168</sup> Annahar. (2024, November 14). بالفيديو- إسرائيل تهدم جامعاً في جنوب لبنان [Video: Israel demolishes a mosque in southern Lebanon]. Retrieved from https://www.annahar.com/Lebanon/Politics/170791 بالفيديو--إسرائيل-تهدم-جامعا-في-جنوب-لبنان/

<sup>169</sup> MTV Lebanon. (2024, November 1). Watch: Explosion of a mosque. Retrieved from https://www.mtv.com.lb/en/News/Local/1510943/watch--explosion-of-a-mosque

<sup>170</sup> This Is Lebanon. (2024, October 23). The Israeli army claims to find weapons inside a mosque in southern Lebanon. Retrieved from https://www.thisislebanon.com/lebanon/411087/

<sup>171</sup> MTV Lebanon. (2024, October 22). Watch: A violent Israeli raid on the vicinity of Al Qaem Mosque in Dahiyeh. Retrieved from https://www.mtv.com.lb/en/News/Local/1505779/watch--a-violent-israeli-raid-on-the-vicinity-of-al-qaem-mosque-in-dahiyeh

October 19, 2024	Majdal Selm, Marjayoun District	Town's Mosque	An Israeli airstrike led to the complete destruction of the mosque in Majdal Selm, claiming it had been used for military purposes. <sup>172</sup>
October 11, 2024	Tayr Dabaa, Tyre District	Town's Mosque and Neighboring House	An Israeli airstrike targeted the mosque and an adjacent house in Tayr Dabaa, causing injuries. 173
October 9,	Derdghaya,	Melkite Catholic	The Catholic pastoral aid organization, Aid to the Church in Need reported that on 9 October 2024, an Israeli missile hit the church, completely destroying it and killing at least eight people inside. Another missile hit a priests house and a three-story building which had the parish offices, completely destroying them as well. 175
2024	Tyre District	Church	
October 6, 2024	Yaroun, Southern Lebanon	Unspecified Mosque	Israeli forces demolished the mosque in Yaroun during intensified military operations in the region. <sup>176</sup>
October 5,	Toul, Southern	Unspecified	The Israeli army announced that it targeted Hezbollah fighters operating within a mosque in Toul, Southern Lebanon. <sup>177</sup>
2024	Lebanon	Mosque	
September	Jezzine, South	Mar Maroun	The facades of Mar Maroun Church in Jezzine were shattered due to Israeli airstrikes. <sup>178</sup>
22, 2024	Lebanon	Church	

<sup>172</sup> This Is Beirut. (2024, October 19). Israeli Airstrikes Escalate Across Lebanese Localities Saturday. Retrieved from https://thisisbeirut.com.lb/articles/1299276/israeli-airstrikes-escalate-across-lebanese-localities-saturday

<sup>173</sup> MTV Lebanon. (2024, October 11). Watch: Israeli Aircraft Targets a Mosque. Retrieved from https://www.mtv.com.lb/en/News/Local/1500170/watch--israeli-aircraft-targets-a-mosque

<sup>174</sup> Aid to the Church in Need UK. (2023, November 10). Lebanon: At least eight killed in airstrike on church. Retrieved from https://acnuk.org/news/lebanon-at-least-eight-killed-in-airstrike-on-church/

<sup>175</sup> Human Rights Without Frontiers. (2023, November 15). Lebanon: Israeli airstrike hits Melkite Greek Catholic Church. Retrieved from https://hrwf.eu/lebanon-israeli-airstrike-hits-melkite-greek-catholic-church/

<sup>176</sup> Al Jazeera. (2024, October 7). Israeli forces blow up mosque in southern Lebanon. Retrieved from https://www.aljazeera.com/program/newsfeed/2024/10/7/israeli-forces-blow-up-mosque-in-southern-lebanon

<sup>177</sup> MTV Lebanon. (2024, October 5). The Israeli Army announced that it targeted Hezbollah fighters in a mosque in the south.

Retrieved from https://www.mtv.com.lb/en/News/Live-Feed/1496365/the-israeli-army-announced-that-it-targeted-hezbollah-fighters-in-a-mosque-in-the-south

<sup>178</sup> This Is Lebanon. (2024, September 22). Mar Maroun Church in Jezzine damaged by Israeli airstrikes. Retrieved from https://www.thisislebanon.com/lebanon/384134/

On the other hand, evidence or allegations of Hezbollah using religious buildings for military purposes raise significant concerns. If substantiated, such actions would constitute a violation of IHL, as they exploit the protected status of these sites and place them at risk of lawful targeting. This misuse undermines the sanctity of religious structures and increases the likelihood of their involvement in armed conflict, compromising their safety and cultural value.

In conclusion, these actions reflect the urgent need for stronger protection of religious and cultural sites during armed conflicts. Independent investigations are essential to verify allegations, assess compliance with IHL, and hold perpetrators accountable for violations. Furthermore, both parties to the conflict must take better care to respect the sanctity of religious structures and avoid their misuse or disproportionate targeting.

## 3.5.3 Targeting Facilities Dedicated to Education, Art, and Science

As previously stated, protecting educational, artistic, and scientific buildings during armed conflict is a cornerstone of IHL. As civilian objects, these institutions are safeguarded under the Hague Regulations (Article 27), the Fourth Geneva Convention (Article 18), and Additional Protocol I (Article 52). However, like any other civilian facility, the misuse of such buildings for military purposes or their disproportionate targeting violates these legal protections.

The conflict between Israel and Hezbollah in Lebanon in 2024 severely impacted Lebanon's educational infrastructure. According to reports, 350 schools sustained damage, with 60 schools completely destroyed. Educational facilities across the country have suffered from both direct and indirect consequences of the hostilities.

In Beirut's southern suburbs, particularly Dahiyeh, several schools were near targeted facilities, including:

- » Imam Mahdi Secondary School
- » Babies First Pre-School
- » Lycee Pilote Beyrouth
- » Al Ghadeer Public School
- » Al-Sanabel School
- » Hussein Ali Nasser School

These schools were located near areas marked as red zones by Israeli forces, indicating proximity to alleged Hezbollah facilities. While no direct reports confirm their complete destruction, their proximity to strikes raise concerns about collateral damage.

<sup>179</sup> United Press International (UPI). (2024, December 4). Lebanon education crisis worsens as schools remain damaged. Retrieved from https://www.upi.com/Top\_News/World-News/2024/12/04/lebanon-education-crisis-lebanon-study/4971733340572/
180 Human Rights Watch. (2025, February 17). Lebanon: Destruction of infrastructure preventing returns. Retrieved from https://www.hrw.org/news/2025/02/17/lebanon-destruction-infrastructure-preventing-returns

## **Table: Warning Announcements by IDF**



While these schools are close to the marked red zones, the maps only indicate warnings and proximity, not confirmed damage. However, given their locations near targeted facilities, there is a likelihood of collateral damage or indirect impact (e.g., structural harm or disruptions). <sup>181</sup> Further on-the-ground reporting or confirmation would be needed to verify any specific damage these schools sustained.

<sup>181</sup> UNICEF USA. (2024). UNICEF risks increasing for children in Lebanon as bombardment continues and essential services falter.

Retrieved from https://www.unicefusa.org/stories/unicef-risks-increasing-children-lebanon-bombardment-continues-essential-services-falter

#### 3.5.4 Targeting Historical Monuments

The war caused significant destruction to Lebanon's cultural heritage, raising critical concerns under IHL, especially the 1954 Hague Convention for the Protection of Cultural Property in the Event of Armed Conflict, which obligates parties to safeguard cultural property during hostilities. The documented destruction of religious and historic sites in Lebanon indicates potential violations of these obligations.

Among the most notable violations were the deliberate targeting and destruction of sites such as the St. George Melkite Catholic Church, where an airstrike killed at least eight people sheltering inside, and the Ottoman-era Souk in Nabatieh, which was bombed during Israeli raids. These attacks contravene IHL principles protecting cultural property and represent a significant loss to Lebanon's cultural identity and historical heritage.

Date	Location	Cultural Heritage Site	Details of Attack/Threat
Various dates (October 6 to October 29)	Southern Lebanon	Historic Villages	Villages such as Mhaibib, Yaroun, and Aita al-Shaab were almost completely destroyed, including their historic houses. 183
November 6, 2024	Baalbek, Bekaa Valley	Ottoman-era An Israeli airstrike damaged the 15 Manshiyeh House and Hotel Palmyra UNESCO-listed Baalbek temple complex	
October 23, 2024	Tyre, South Lebanon	UNESCO World Heritage Site	Airstrikes near the ancient city caused damage to structures dating to the Byzantine and Ottoman periods. 185
October 13, 2024	Kfar Tibnit, South Lebanon	18th-century Mosque	An Israeli raid destroyed the mosque, one of three mosques damaged during the conflict. 186
October 12, 2024	Nabatieh, South Lebanon	Ottoman-era Souk	Airstrikes destroyed the historic market dating from the Ottoman period. 187
October 9, 2024	Derdghaya, South Lebanon	St. George Melkite Catholic Church	Israeli airstrike destroyed the 19th-century church, killing at least eight people sheltering inside. 188

<sup>182</sup> The New Arab. (2024). Heritage at risk: Israel targets Lebanon's historic landmarks. Retrieved from https://www.newarab.com/features/heritage-risk-israel-targets-lebanons-historic-landmarks

<sup>183</sup> Ibid.

<sup>184</sup> Reuters. (2024, November 7). Israeli strike destroys Ottoman-era building near Baalbek ruins. Retrieved from https://www.reuters.com/world/middle-east/israeli-strike-destroys-ottoman-era-building-near-baalbek-ruins-2024-11-07/

<sup>185</sup> Al Jazeera. (2024, October 28). Israeli air strikes pummel Lebanese historic city of Tyre. Retrieved from https://www.aljazeera.com/gallery/2024/10/28/israeli-air-strikes-pummel-lebanese-historic-city-of-tyre

<sup>186</sup> Al Jazeera. (2024, October 13). 'Apocalyptic': Israel destroys mosque, bombs market in southern Lebanon. Retrieved from https://www.aljazeera.com/news/2024/10/13/apocalyptic-israel-destroys-mosque-bombs-market-in-southern-lebanon

<sup>187</sup> The New Arab. (2024). Heritage at risk: Israel targets Lebanon's historic landmarks. Retrieved from https://www.newarab.com/features/heritage-risk-israel-targets-lebanons-historic-landmarks

<sup>188</sup> Catholic News Agency. (2024). Israeli missile destroys Catholic church in Lebanon; at least 8 dead. Retrieved from https://www.catholicnewsagency.com/news/259815/israeli-missile-destroys-catholic-church-in-lebanon-at-least-8-dead

Additionally, airstrikes near UNESCO World Heritage Sites in Tyre and Baalbek caused damage to structures from the Byzantine, Ottoman, and Roman eras, demonstrating a lack of regard for international commitments to preserve such landmarks for future generations. The obliteration of historic villages such as Mhaibib, Yaroun, and Aita al-Shaab, including their culturally significant buildings, constitutes a devastating blow to Lebanon's cultural landscape, and such acts may be classified as "urbicide," 189 the deliberate destruction of urban areas and their cultural heritage.

In response to these threats, Lebanon called upon international bodies to act. The Lebanese Parliament convened on November 10, 2024, voting to request official intervention from UNESCO and other cultural protection organizations. <sup>190</sup> As a result, UNESCO granted 'enhanced protection' to 34 cultural sites in Lebanon, including Baalbek and Tyre, ensuring these sites receive the highest level of immunity against attacks under international law. <sup>191</sup> Furthermore, the International Council on Monuments and Sites (ICOMOS) issued a statement condemning the critical threats to Lebanon's cultural heritage and urging adherence to international legal protections. <sup>192</sup>

## 3.5.5 Targeting Hospitals and Places Where the Sick and Wounded Are Collected

The targeting of hospitals by IDF during the 2024 war between Israel and Hezbollah represent critical violations of IHL. Hospitals are explicitly protected under the Hague Regulations, namely Article 27 and Article 18 of the Fourth Geneva Conventions, which safeguard civilian medical facilities during armed conflicts unless used for military purposes.

The repeated targeting of hospital vicinities raises significant questions about adherence to distinction, proportionality, and precaution principles. Under Article 48 of Additional Protocol I, parties to a conflict must distinguish between civilian objects, such as hospitals, and military objectives. Yet, many documented attacks indicate direct strikes on hospitals or bombardments close enough to disrupt their operations. Regarding proportionality, attacks like the one near Rafic Hariri University Hospital, which caused civilian casualties and significant damage, call into question whether the anticipated military advantage justified the harm inflicted on civilians and medical services. Further, the strikes on buildings adjacent to hospitals demonstrate insufficient precautions to minimize incidental harm to protected facilities, violating Article 57 of Additional Protocol I.

Below is the table presenting some the most prominent violations:

<sup>189</sup> Philippe Pernot. The New Arab (2024). Concern for Lebanon's heritage grows as Israel intensifies destruction of historic landmarks. Retrieved from https://www.newarab.com/features/heritage-risk-israel-targets-lebanons-historic-landmarks

<sup>190</sup> Al-Monitor. (2024, November). Lebanon MPs demand UN protection for heritage sites from Israel attacks. Retrieved from https://www.al-monitor.com/originals/2024/11/lebanon-mps-demand-un-protection-heritage-sites-israel-attacks

<sup>191</sup> ARTnews. (2024). UNESCO grants new protections to Lebanese heritage sites imperiled by war with Israel. Retrieved from https://www.artnews.com/art-news/news/unesco-grants-new-protections-to-lebanese-heritage-sites-imperiled-by-war-with-israel-1234724272/

<sup>192</sup> International Council on Monuments and Sites (ICOMOS). (2024). ICOMOS statement on immediate and grave threats to Lebanon's cultural heritage. Retrieved from https://www.icomos.org/en/89-english-categories/home/143498-icomos-statement-on-immediate-and-grave-threats-to-lebanon-s-cultural-heritage

Date	Region	Targeted Facility	Attack details/type of violation	
November 5, 2024	Toul, Nabatieh District, Lebanon	Sheikh Ragheb Hospital	Israeli warplanes targeted a building at the entrance of Sheikh Ragheb Hospital, causing structural damage and raising concerns about the safety of medical staff and patients. <sup>193</sup>	
November 2, 2024	Bint Jbeil, South Lebanon	Tebnine Governmental Hospital	Israeli airstrikes targeted the vicinity of the hospital causing significant damage to its infrastructure and disrupting medical services. Nearby towns were also bombarded. 194	
October 22, 2024	Jnah, Beirut	Rafic Hariri Governmental Hospital	An Israeli airstrike near the hospital destroyed through buildings 50 meters away, killing 18 people (including 4 children) and injuring 60. The hospital was damage and patients and staff were evacuated. 195	
October 15, 2024	Beirut, Lebanon	Behmen Hospital Israeli warplanes conducted an airstrike n hospital, causing structural damage and leadin evacuation of patients and staff. No casualti reported. <sup>196</sup>		
October 12, 2024	Beirut Lebanon	Al Sahel Hospital	The Israeli military claimed that Hezbollah was sto cash and gold beneath the hospital to finance operations. 197 The Lebanese hospital director der these allegations, and U.S. officials stated there was evidence to support the claim. 198 Israel indicated it we not target the hospital to avoid civilian casualties. 199	
October 10, 2024	Zahle, Bekaa	Tall Shiha Hospital	Tall Shiha Hospital was damaged by nearby shelling, leading to operational difficulties and concerns for the safety of its staff and patients. <sup>200</sup>	

<sup>193</sup> MTV Lebanon. (2024, November 5). NNA: Warplanes targeted a building at the entrance of Sheikh Ragheb Hospital in Toul. Retrieved from https://www.mtv.com.lb/en/News/Live-Feed/1512174/nna--warplanes-targeted-a-building-at-the-entrance-of-sheikh-ragheb-hospital-in-toul

200 Ibid.

<sup>194</sup> This Is Lebanon. (2024, November 2). استهداف مُحيط مستشفى تبنين الحكومي [The vicinity of Tebnine Governmental Hospital targeted]. Retrieved from https://www.thisislebanon.com/lebanon/417650/

<sup>195</sup> MTV Lebanon. (2024, October 22). Watch: Enemy warplanes launch a raid on the vicinity of Rafik Hariri University Hospital in the Jnah area. Retrieved from https://www.mtv.com.lb/en/News/Local/1505210/watch--enemy-warplanes-launches-a-raid-on-the-vicinity-of-rafik-hariri-university-hospital-in-the-jnah-area

<sup>196</sup> LBCI News. (2024, October 15). Israeli airstrike near Saint George Hospital causes damage and evacuation. Retrieved from https://x.com/LBCI\_NEWS/status/1848829669639966782

<sup>197</sup> MTV Lebanon. (2024, October 21). Israel claims Hezbollah hides cash beneath hospital in Haret Hreik. Retrieved from https://www.mtv.com.lb/en/News/Local/1505158/israel-claims-hezbollah-hides-cash-beneath-hospital-in-haret-hreik

<sup>198</sup> Reuters. (2024, October 21). Hezbollah hides millions of cash and gold under Beirut hospital, says Israel. Retrieved from https://www.reuters.com/world/middle-east/hezbollah-hides-millions-cash-gold-under-beirut-hospital-says-israel-2024-10-21

<sup>199</sup> Reuters. (2024, October 23). U.S. has not seen evidence of Hezbollah cash bunker under Beirut hospital: Pentagon. Retrieved from https://www.reuters.com/world/middle-east/us-has-not-seen-evidence-hezbollah-cash-bunker-under-beirut-hospital-pentagon-2024-10-23

October 10, 2024	Rayah, Bekaa	Rayak Hospital	Rayak Hospital sustained damage as a result of airstrikes in its vicinity, which caused structural harm and disrupted essential medical services. <sup>201</sup>	
October 8 2024	Tyre, South Lebanon	Hiram Hospital	An Israeli airstrike targeted a building near Hira Hospital at the southern entrance of Tyre. While thospital itself was not directly hit, the proximity of tattack posed significant risks to the medical facility a its occupants. <sup>202</sup>	
October 2024	Southern Suburbs of Beirut, Lebanon	Sainte Thérèse Hospital	The hospital sustained significant damage due to heavy bombardment in its vicinity. Despite the damage, the hospital administration decided to keep its doors open and continue medical services. <sup>203</sup>	
October 4, 2024	Bint Jbeil, South Lebanon	Salah Ghandour Hospital	Israeli artillery shelling targeted the hospital premises causing injuries among the medical staff. The Lebanese Red Cross evacuated the injured to nearby hospitals. <sup>204</sup>	
November 11, 2023	Meiss El Jabal, South Lebanon	Meiss El Jabal Hospital	The Lebanese Ministry of Health condemned Israe shelling of the hospital, causing damage to infrastructure and disrupting health services. <sup>205</sup>	

In some cases, Israel justified its actions by claiming that hospitals were being misused for military purposes, such as storing weapons or cash (e.g., Al Sahel Hospital). While IHL permits targeting civilian structures used for military operations, such claims require clear evidence and advance warnings to allow evacuation. However, there has been no independent verification of these allegations.

Consequently, the damage to hospitals devastated Lebanon's healthcare system, already strained by economic challenges. With many facilities partially or fully disrupted, access to medical care for wounded civilians became increasingly limited. The evacuation of hospitals at Saint George Hospital and Rafic Hariri University Hospital further compounded the humanitarian crisis.<sup>206</sup>

<sup>201</sup> This Is Lebanon. (2024, October 10). [Riyak Hospital and Tal Shiha Hospital were damaged by Israeli shelling] مستشفى رياق Retrieved from https://www.thisislebanon.com/lebanon/402879/

<sup>202</sup> MTV Lebanon. (2024, October 8). NNA: Israeli enemy launched an airstrike near the Hiram Hospital in Tyre. Retrieved from https://www.mtv.com.lb/en/News/Live-Feed/1498167/nna--israeli-enemy-launched-an-airstrike-near-the-hiram-hospital-in-tyre

<sup>203</sup> IMLebanon. (2024, October 7). [Hospital operating under bombardment] مستشفى يعمل تحت القصف. Retrieved from https://www.imlebanon.org/2024/10/07/hospital544332/

<sup>204</sup> This is Lebanon. (2024, October 4). الصليب الأحمرينقل الإصابات من مستشفى غندور [The Red Cross transfers the injured from Ghandour Hospital]. Retrieved from https://www.thisislebanon.com/lebanon/395648/

<sup>205</sup> MTV Lebanon. (2023, November 10). Lebanon's Ministry of Health condemns Israeli shelling of Meiss El Jabal Hospital in South Lebanon. Retrieved from https://www.mtv.com.lb/en/News/Local/1402547/lebanon-s-ministry-of-health-condemns-israeli-shelling-of-meiss-el-jabal-hospital-in-south-lebanon

<sup>206</sup> L'Orient Today. (2024). Which hospitals has the Israeli army damaged and forced to close?. Retrieved from https://today. lorientlejour.com/article/1434191/which-hospitals-has-the-israeli-army-damaged-and-forced-to-close.html

# 4.Impact on IDPs

## 4.1 Legal Framework for Internally Displaced Persons

## 4.1.1 Definition

Internally Displaced Persons (IDPs) are individuals who have been forced to flee their homes due to armed conflict, generalized violence, human rights violations, or natural disasters but have not crossed an internationally recognized border. Unlike refugees, IDPs remain within their country of origin and, therefore, do not benefit from the protections afforded by the 1951 Refugee Convention.<sup>207</sup> However, the UN Guiding Principles on Internal Displacement (1998)<sup>208</sup> provide the most comprehensive international framework for the protection of IDPs, defining them as:

"persons or groups of persons who have been forced or obliged to flee or to leave their homes or places of habitual residence, in particular as a result of or in order to avoid the effects of armed conflict, situations of generalized violence, violations of human rights or natural or human-made disasters, and who have not crossed an internationally recognized State border." (UN Office for the Coordination of Humanitarian Affairs [OCHA], 1998, Principle 2).

Unlike refugees, who fall under the specific mandate of the UNHCR, IDPs remain under the legal jurisdiction of their national government, which bears primary responsibility for ensuring their protection and access to essential services. However, during armed conflicts, State authorities, especially ones that are in a state of war like Lebanon, more complex when you add the economic crisis, the political turmoil, and the already-existing conflicts in the country, may be unable or unwilling to provide these protections, making IDPs particularly vulnerable.

<sup>207</sup> Office of the United Nations High Commissioner for Human Rights (OHCHR). (n.d.). Fact sheet no. 20: Human rights and refugees. Retrieved from https://www.ohchr.org/sites/default/files/Documents/Publications/FactSheet20en.pdf

<sup>208</sup> United Nations Commission on Human Rights. (1998). Guiding principles on internal displacement(E/CN.4/1998/53/Add.2). Retrieved from https://www.unhcr.org/protection/idps/43ce1cff2/guiding-principles-internal-displacement.html

<sup>209</sup> United Nations High Commissioner for Refugees (UNHCR). (n.d.). Internally displaced people. Retrieved from https://www.unhcr.org/about-unhcr/who-we-protect/internally-displaced-people

#### 4.1.2 Legal Protection for IDPs under International Law

IHL provides a comprehensive legal framework to prevent civilians' displacement during armed conflicts and mitigate the suffering they cause. The rules established under IHL have twofold functions: preventive and protective. On the one hand, they ensure that civilians are not forcibly displaced, and on the other, if displacement occurs, they receive adequate protection and assistance throughout their displacement.

First, regarding prevention provisions, they are designed to prohibit forced displacement and limit the causes that lead to displacement during armed conflicts. These include the prohibition of forced displacement, which confirms, according to Article 49 of the Fourth Geneva Convention (1949), that parties to an armed conflict are prohibited from forcibly displacing civilian populations unless it is required for their security or due to imperative military reasons. <sup>210</sup> In addition, they must protect from indiscriminate attacks, as IHL prohibits direct attacks against civilians and civilian objects, ensuring that indiscriminate violence does not lead to mass displacement.

Second, when displacement does occur, IHL establishes obligations for parties to the conflict to protect and assist IDPs. These protections include humane treatment and the obligation to treat IDPs with dignity and protect them from violence, exploitation, and abuse.<sup>211</sup> In addition to protection, IHL obligates all parties to allow humanitarian organizations access to displaced populations and ensure the delivery of food, water, shelter, and medical assistance.<sup>212</sup> Further, special consideration is given to protecting children, women, and other vulnerable groups.<sup>213</sup> Family unity must be preserved, and efforts should be made to reunite separated family members.<sup>214</sup>

In parallel, IHRL provides essential protections for IDPs, recognizing their right to freedom of movement, security, and non-discrimination. Indeed, both the attacking and defending parties in an armed conflict remain bound by IHRL obligations, which require them to ensure the safety and dignity of displaced populations. The UN Guiding Principles on Internal Displacement further reinforce these protections, affirming that IDPs have the right to seek safety in another part of the country, receive humanitarian assistance, and access adequate living conditions. Indeed, principle 25 explicitly states that international humanitarian organizations must be granted unimpeded access to assist IDPs, underscoring their right to essential relief efforts.

<sup>210</sup> International Committee of the Red Cross (ICRC). (1977). Additional Protocol II to the Geneva Conventions, Article 17: Prohibition of forced movement of civilians. Retrieved from https://ihl-databases.icrc.org/en/ihl-treaties/apii-1977/article-17

<sup>211</sup> International Committee of the Red Cross (ICRC). (2009). Internally displaced persons and international humanitarian law. Retrieved from https://www.icrc.org/en/doc/assets/files/other/icrc\_002\_0970.pdf

<sup>212</sup> International Committee of the Red Cross (ICRC). (1977). Additional Protocol II to the Geneva Conventions, Article 18: Relief societies and humanitarian relief. Retrieved from https://ihl-databases.icrc.org/en/ihl-treaties/apii-1977/article-18

<sup>213 &</sup>quot;In the distribution of relief consignments, priority shall be given to those persons, such as children, expectant mothers, maternity cases and nursing mothers, who, under the Fourth Convention or under this Protocol, are to be accorded privileged treatment or special protection." –International Committee of the Red Cross (ICRC). (1977). Additional Protocol I to the Geneva Conventions, Article 70: Relief actions. Retrieved from https://ihl-databases.icrc.org/en/ihl-treaties/api-1977/article-70

<sup>214</sup> International Committee of the Red Cross (ICRC). (1977). Additional Protocol I to the Geneva Conventions, Article 74: Reunion of dispersed families. Retrieved from https://ihl-databases.icrc.org/en/ihl-treaties/api-1977/article-74

<sup>215</sup> International Covenant on Civil and Political Rights. (1966). Articles 12, 9, & 26.

## 4.2 Displacement Due to Israeli Airstrikes in 2023-2024

Since the onset of the conflict, entire towns and villages along the Israeli-Lebanese border have been evacuated, leading to an unprecedented displacement crisis. The number of IDPS in Lebanon has surged dramatically, from approximately 110,000 between October 2023 and September 2024 to over 875,180 by November 7, 2024. Displaced individuals and families have sought refuge in various locations, primarily in Beirut's coastal areas such as Ain El Mreisseh, Manara, and Raouche, or with relatives in Mount Lebanon, Zahle, Baalbek, and North Lebanon. Indeed, while some IDPs have found shelter in homes or rented accommodations, many are residing in overcrowded shelters or, in more extreme cases, in open-air spaces such as Martyr's Square in Beirut and the Seaside Corniche. As the number of IDPs was more than the expected capacity and as there was no response plan, some individuals lived in makeshift conditions on Beirut's public beaches, such as Ramlet al Baida, where thousands have been seen sleeping on mats, cardboard, and blankets.

While initial displacement was concentrated in the southern regions of Lebanon, the crisis has since expanded due to the intensification of Israeli airstrikes targeting areas previously considered safe, such as the Bekaa Valley and the southern suburbs of Beirut. Tens of thousands of residents from these regions have been forced to flee, exacerbating the pressure on available shelter spaces and humanitarian aid networks.<sup>219</sup>

Many families have also sought refuge outside Lebanon, particularly in Europe or the US for those with dual nationalities, or the Syrian Arab Republic, where approximately 75,000 Lebanese have crossed into Syria under challenging circumstances due to the deteriorating security situation. While many are renting accommodations in Damascus and Rural Damascus, a smaller number are being hosted in 16 collective shelters located in Homs, Hama, and other areas. Unfortunately, these shelters are in poor condition and face significant food shortages, of hygiene products and adequate sanitation facilities.<sup>220</sup>

Another major destination for Lebanese refugees was Iraq (especially from the Shiite community), who were vocally welcomed in various areas of Iraq by solidarity statements of the Iraqi government.<sup>221</sup> People who have sought refuge have reported that the journey through Syria has been particularly challenging, typically taking 1 to 2 days by bus or taxi, while some choose the more expensive option of flying out of Beirut. Many Lebanese refugees in Iraq are

<sup>216</sup> International Organization for Migration. (n.d.). Crisis in Lebanon. Retrieved from https://www.iom.int/crisis-lebanon (accessed 08.02.25)

<sup>217</sup> Carnegie Endowment for International Peace. (2024, October). On the ground with Lebanon's displaced. Retrieved from https://carnegieendowment.org/middle-east/diwan/2024/10/on-the-ground-with-lebanons-displaced?lang=en (accessed 12.02.25)
218 Ibid

<sup>219</sup> ReliefWeb. (2024, November 5). Lebanon crisis situational analysis. Retrieved from https://reliefweb.int/report/lebanon/lebanon-crisis-situational-analysis-5-november-2024 (accessed 12.02.25)

<sup>220</sup> Danish Refugee Council. (2024). DRC Syria emergency response to displacement from Lebanon - Situation Report #1 (September 23rd - October 8th, 2024). Retrieved from https://reliefweb.int/report/syrian-arab-republic/drc-syria-emergency-response-displacement-lebanon-situation-report-1-september-23rd-october-8th-2024 (accessed 09.02.25)

<sup>221</sup> The Media Line. (n.d.). Iraq prioritizes Lebanese Shiite refugees, leaving others with little aid. Retrieved from https://themedialine.org/top-stories/iraq-prioritizes-lebanese-shiite-refugees-leaving-others-with-little-aid/

currently hosted in cities such as Najaf and Karbala, where local authorities have designated specific residential buildings for their accommodation. Others have sought refuge in cities like Erbil, where there is an established expatriate community, staying with friends or family.<sup>222</sup>

## 4.3 Displacement Due to Hezbollah airstrikes in 2023-2024

On the Israeli side, 60,000 people were displaced from their homes in northern areas near the borders with Lebanon. These displacements occurred through official evacuation orders or voluntary evacuations due to security concerns. Residents were largely put up in hotels in other areas of the country, paid for by the state.<sup>223</sup>

A recent survey conducted by the Israeli nonprofits 121 Engine for Social Change and 710 West, in collaboration with the Maagar Mochot research institution, examined the experiences of evacuees from northern Israel after one year away from their homes. The study found that approximately 70% of these evacuees are contemplating not returning to their communities, while 3% have already relocated permanently.<sup>224</sup>

## 4.4 Lebanon State Response & Impact

## **4.4.1 Government Response and Challenges**

Despite the severity of the crisis, the Lebanese government's response has been slow and largely ineffective. Consequently, as previously stated, many displaced persons have attempted to secure their accommodations by renting properties in areas perceived as safer, including regions north and east of Beirut such as Metn, Keserwan, and Koura. Key challenges include:

- Funding shortages, as the Lebanese government's financial crisis has limited its ability to allocate sufficient resources for emergency response.
- Poor planning prospectives, many vulnerable groups, such as refugees or migrant domestic workers, were not included in the emergency response plan.
- Political disengagement and the absence of clear political will and leadership have stalled coordination efforts.
- Poor inter-agency coordination and long-standing governmental inefficiency and mismanagement issues have hampered relief efforts.

<sup>222</sup> Rudaw. (2024, October 8). UNHCR 'gathering information' on Lebanese arrivals in Iraq. Retrieved from https://www.rudaw.net/english/middleeast/iraq/081020241 (accessed 10.02.25)

Sokol, S. (2024, August 28). Return of displaced northern residents to their homes becomes an official war goal. The Times of Israel. https://www.timesofisrael.com/return-of-displaced-northern-residents-to-their-homes-becomes-an-official-war-goal/

<sup>224</sup> Neifakh, V. (2024, October 31). One year in limbo: Displaced Israeli families continue life in hotels with no end in sight. The Jerusalem Post. https://www.jpost.com/israel-news/article-827032

As a result, local municipalities —especially those in the south — have been left to manage much of the crisis independently. These municipalities are heavily reliant on support from international organizations and NGOs to provide food, medical aid, and temporary shelter for displaced families. At the same time, humanitarian organizations are currently facing significant challenges in their efforts to provide relief to those affected by the crisis. Groups such as UNRWA, UNICEF, and Save the Children have quickly mobilized to deliver emergency aid, including hygiene kits, food parcels, water, and blankets. However, the scale of the crisis far exceeds their capacity to respond. Funding shortfalls, logistical issues, and the overwhelming number of displaced individuals have severely hindered relief efforts and coordinated responses.<sup>225</sup>

## 4.4.2 - Impact on Education

The conflict has deepened Lebanon's education crisis, exacerbating learning losses that have accumulated over the past six years. According to a study by the Centre for Lebanese Studies and the University of Cambridge's REAL Centre, students in Lebanon have already lost up to 60% of their schooling time since 2018 due to strikes, economic instability, the COVID-19 pandemic, and disruptions caused by the 2020 Beirut explosion. The latest escalation has compounded these challenges, leaving over 1 million students and 45,000 teachers directly affected by displacement and school closures.<sup>226</sup>

The Lebanese Ministry of Education and Higher Education attempted to reopen public schools on November 4, 2024, but widespread violence, displacement, and damage to infrastructure have made normal operations nearly impossible. The study found that 40% of Lebanon's public schools have been repurposed as shelters for displaced families, additionally, 30% of schools are in active conflict zones, making it unsafe for students to attend. Further, in heavily affected regions such as Baalbek-Hermel, the South, and Nabatiyeh, very few schools are functioning.<sup>227</sup>

Among 303 public schools that resumed operations, many have had to implement hybrid or online learning due to safety concerns. However, widespread electricity shortages, weak internet infrastructure, and a lack of digital devices have made remote learning inaccessible for many students. Additionally, 77% of parents and 66% of teachers reported that their financial situations have worsened due to the conflict, limiting their ability to afford school-related expenses, such as transportation and learning materials. Refugee children and students with disabilities remain particularly vulnerable, with an estimated 5,000 children with disabilities at risk of dropping out due to a lack of inclusive learning support.<sup>228</sup>

<sup>225</sup> Ibid.

<sup>226</sup> University of Cambridge. (2024, October). War in Lebanon has turned a decade of education crisis into a catastrophe – report. Retrieved from https://www.cam.ac.uk/research/news/war-in-lebanon-has-turned-a-decade-of-education-crisis-into-a-catastrophe-report#:~:text=Israel%2DHezbollah%20conflict%20has%20deepened,6%20years%2C%20new%20research%20warns. (accessed 10.02.25)

<sup>227</sup> Ibid.

<sup>228</sup> Education International. (2024). Education voices: Manal Hdaife on the impact of war on education communities in Lebanon. Retrieved from https://www.ei-ie.org/en/item/29284:education-voices-manal-hdaife-on-the-impact-of-war-on-education-communities-in-lebanon. (accessed 10.02.25)

On the other hand, the situation in Lebanon's higher education sector is similarly dire. Universities, which were already struggling with financial instability and declining enrollment, now face additional challenges due to the conflict. According to the Ministry of Education and Higher Education (MEHE), an estimated 549,675 university students and 45,400 faculty members are in directly affected areas, including 37,000 students at the state-run Lebanese University, 52,000 students at private universities and 2,450 faculty members at Lebanese University.<sup>229</sup>

Several university campuses have sustained damage due to nearby airstrikes, including Lebanese University's Hadath campus in Beirut and Saint Joseph University's (USJ) Ras al Naba'a campus. As a result, all universities have shifted to hybrid learning models, though electricity shortages and internet disruptions have hindered this. Consequently, many students, particularly those enrolled in private universities, are seeking scholarships abroad. The Lebanese University alone is projected to need \$7.44 million in immediate funding to sustain operations. Meanwhile, some institutions, such as the American University of Beirut (AUB) and the Lebanese American University (LAU), anticipated needing up to \$100 million in emergency financial aid if the conflict had further exacerbated.<sup>230</sup>

## 4.4.3 Increase of Rent Prices and Overcrowding

This wave of internal displacement has hit some of the most vulnerable regions of the country — areas like Tyre, Nabatieh, and Saida, which have historically been neglected by the central government and have long suffered from economic deprivation, underdevelopment, and inadequate infrastructure. The conflict has not only devastated homes and livelihoods but has also cut off entire communities from access to clean water, medical supplies, and basic sanitation.

The sudden influx of displaced families into relatively safer regions—such as Beirut, Mount Lebanon, and parts of North Lebanon—has overwhelmed the housing market, leading to a sharp rise in rent prices. In some areas, rental prices for furnished apartments have quadrupled, while unfurnished units have also seen substantial increases. This surge in demand has resulted in price gouging, with landlords exploiting the desperation of those fleeing violence.<sup>231</sup> It is also undeniable that many have taken advantage of the situation in many areas and have increased their rent prices to profit from a disastrous situation. In the absence of control from the government over prices, especially in terms of the requirement of registration of rent contracts (at least in practice), this exploitation was made easy for whomever desired to engage in such practices.

Many displaced individuals struggle to secure temporary housing between overcrowding and impossibly high upfront costs. Those unable to afford rent have turned to occupied vacant buildings or crammed into shared accommodations. For instance, Ahmad Mansour, an 80-year-

<sup>229</sup> University World News. (2024, November 27). Israeli military attacks worsen Lebanese university crises. Retrieved from https://www.universityworldnews.com/post.php?story=20241127122935189. (accessed 10.02.25)
230 Ibid.

<sup>231</sup> L'Orient Today. (2024). Displaced: The surge in rent prices in Lebanon continues. Retrieved from https://today.lorientlejour.com/article/1430057/displaced-the-surge-in-rent-prices-in-lebanon-continues.html (accessed 10.02.25)

old displaced from Aytaroun, fled Israeli bombardment with his family, spending 14 hours on the road before reaching Beirut. They are now sheltering in Khaldeh with five other families.<sup>232</sup>

Beyond financial strain, overcrowding poses significant risks to displaced families, including health risks as crowded shelters with limited sanitation and access to clean water increases the risk of disease outbreaks; psychological stress, as families living in confined spaces with strangers experience heightened anxiety and trauma; additionally, to the lack of privacy and safety concerns, leading to increased vulnerability, particularly for women and children, in unsafe living conditions.<sup>233</sup>

## 4.4.4 Categories of IDPs Affected by the Conflict

The ongoing conflict between Israel and Hezbollah has led to a severe humanitarian crisis, resulting in mass displacement across Lebanon. The crisis has affected several vulnerable populations, including Palestinian refugees, Syrian refugees, Lebanese nationals, and migrant domestic workers (MDWs), each facing systematic violations of their fundamental rights. These violations, ranging from forced displacement to inadequate humanitarian assistance, highlight the urgent need for a coordinated response to protect those most affected by the violence.

## Palestinian IDPs: Systematic Displacement and Institutional Neglect

Palestinian refugees in Lebanon have historically lived in a precarious legal and social status, and the recent conflict has only intensified their vulnerability. Israeli airstrikes have targeted Palestinian refugee camps, including Ein El-Hilweh, Rashidieh, Burj al-Barajneh, El Buss, and Beddawi, leading to mass displacement.<sup>234</sup> UNRWA has reported that several camps are now nearly empty as residents flee the violence. However, Palestinians in Lebanon are denied Lebanese citizenship, restricting their ability to access social services, employment, and adequate housing. Many displaced Palestinians have sought refuge in other overcrowded camps or with relatives, yet humanitarian assistance remains insufficient due to legal restrictions preventing Palestinian-led organizations from providing direct aid. This exclusionary policy exacerbates their suffering, as many families struggle to secure food, shelter, and medical care.

The attacks on refugee camps not only violate the right to protection from forced displacement but also undermine the right to adequate housing and living conditions, as enshrined in international human rights law. The destruction of Palestinian homes, coupled with limited access to emergency assistance, leaves displaced individuals in a state of legal limbo, unable to return to their homes or find alternative safe accommodations. The targeting of refugee camps further violates international humanitarian law, which prohibits attacks on civilian areas and infrastructure critical for survival.<sup>235</sup>

Euronews. (2024, September 27). Lebanese people fleeing Israeli bombardment face rent gouging and overcrowding. Euronews. Retrieved from https://www.euronews.com/2024/09/27/lebanese-people-fleeing-israeli-bombardment-face-rent-gouging-and-overcrowding (accessed 10.02.25)

<sup>233</sup> Ibid.

<sup>234</sup> ACAPS. (2024). Humanitarian impact of escalating Hezbollah-Israel hostilities. Retrieved from https://www.acaps.org/fileadmin/Data\_Product/Main\_media (accessed 10.02.25)

<sup>235</sup> UNRWA. (2024). Syria, Lebanon, and Jordan emergency appeal – Progress report 2024. Retrieved from https://www.unrwa.org/resources/reports/syria-lebanon-and-jordan-emergency-appeal-2024-progress-report (accessed 10.02.25)

## Syrian Refugees: Rising Xenophobia and Forced Evictions

The situation for Syrian refugees in Lebanon is equally dire. Lebanon hosts approximately 1.5 million Syrian refugees, with 815,000 registered with UNHCR. Many of these refugees, who originally fled the Syrian civil war, now find themselves displaced once again due to the ongoing Israeli bombardment. Airstrikes near informal refugee settlements have forced many Syrians to flee, seeking shelter in increasingly overcrowded conditions. However, Syrian refugees face additional barriers, including forced evictions by landlords who fear their properties may become military targets. Reports indicate that Lebanese authorities and local landlords have removed Syrian tenants without providing alternative housing options, leaving many refugees homeless.<sup>236</sup>

Beyond the immediate displacement crisis, Syrians in Lebanon are also facing rising xenophobia and political scapegoating. Lebanese politicians have intensified anti-refugee rhetoric, blaming Syrians for the country's economic crisis and security threats. This incitement has led to increased violence and hostility against Syrian refugees, who are being denied access to emergency shelters and humanitarian aid. Many Syrians are now considering returning to Syria despite the risks of arbitrary detention, torture, and persecution by the Syrian government (before the fall of the regime on December 8th, 2024). The forced return of refugees to unsafe conditions violates the principle of non-refoulement, a cornerstone of international refugee protection, which prohibits the return of individuals to a country where they face serious harm.<sup>237</sup>

#### Migrant Domestic Workers: Forgotten Shadows

MDWs in Lebanon, already among the most vulnerable groups due to Lebanon's restrictive *kafala* (sponsorship) system, have found themselves in an even more precarious situation due to the conflict. Many MDWs, particularly those from Ethiopia, the Philippines, and Bangladesh, have been abandoned by their employers as they flee conflict zones, leaving them without shelter, food, or access to financial resources. Some MDWs have been forcibly evicted from homes or shelters, while others have been trapped in locked residences, unable to escape due to restrictions on their movement.<sup>238</sup>

MDWs in Lebanon face extreme legal and social vulnerabilities, including a lack of freedom of movement, limited labor protections, and no access to social security benefits. Under normal circumstances, migrant workers face abusive working conditions, including forced labor, wage theft, and physical abuse. The escalation of conflict has only heightened these abuses, as displaced MDWs now have no legal pathway to repatriation or emergency evacuation. Many embassies have failed to provide assistance, leaving thousands stranded in unsafe conditions. The failure of both employers and the Lebanese government to ensure the safety and well-being of MDWs during a humanitarian crisis constitutes a violation of international labor rights and protections against human trafficking and forced labor.<sup>239</sup>

<sup>236</sup> The New Arab. (2024). How Israel's escalation in south Lebanon impacts Syrian refugees. Retrieved from https://www.newarab.com/analysis/how-israels-escalation-south-lebanon-impacts-syrian-refugees (accessed 10.02.25)

<sup>237</sup> UNHCR. (2024). UNHCR: Lebanon crisis deepens as Israeli airstrikes intensify. Retrieved from https://www.unhcr.org/us/news/briefing-notes/unhcr-lebanon-crisis-deepens-israeli-airstrikes-intensify

<sup>238</sup> The New Humanitarian. (2024). Lebanon's migrant workers left stranded and homeless by Israeli attacks. Retrieved from https://www.thenewhumanitarian.org/news-feature (accessed 10.02.25)

<sup>239</sup> Reuters. (2024). Lebanon's migrant workers stuck in limbo as thousands flee conflict. Retrieved from https://www.reuters.com/world/middle-east (accessed 10.02.25)

#### 4.4.5 Rising Internal Tensions and Impact on IDPs

The influx of IDPs has exacerbated existing social and economic strains, leading to heightened tensions between host communities and IDPs. Because of the surge in rental prices discussed above, as the increased demand for housing has allowed landlords to raise rents substantially, this escalation has led to competition for affordable housing, with many IDPs struggling to secure shelter. In some cases, IDPs have resorted to occupying vacant buildings, which has caused friction with property owners and local authorities. On that matter, the occupation of abandoned buildings by IDPs raised complex legal and ethical questions. Legally, occupying private property without the owner's consent is considered trespassing under Lebanese law. However, the dire circumstances faced by many IDPs, exacerbated by ongoing conflicts and displacement and the absence of the government, have led to instances where such occupations occur out of necessity. Yet, the Lebanese judiciary has not ruled in favor of allowing IDPs to occupy empty buildings.

A notable case is the Hamra Star building in Beirut's Hamra district. This former hotel, abandoned for over a decade, became a refuge for approximately 300 individuals displaced by Israeli aggression. In October 2024, Lebanese security forces attempted to evict the occupants, leading to clashes. An agreement was eventually reached, allowing women and children to remain temporarily. Similarly, in Beirut's commercial district, authorities have faced challenges with IDPs occupying vacant properties. In one instance, Lebanese police stormed an abandoned building to evict hundreds of displaced individuals who had been squatting there for weeks.

These situations highlight the tension between property rights and the immediate humanitarian needs of displaced populations. While property owners have legal rights to their assets, the lack of adequate shelter options forces many IDPs into informal settlements or occupations. The Lebanese government's limited capacity to provide sufficient housing solutions exacerbates this issue, leading to repeated cycles of displacement and temporary sheltering in unsuitable locations.

In another case, on October 24, 2024, clashes erupted in Afqa, a village in Lebanon's Jbeil mountains, between displaced individuals fleeing Israeli offensives and the ISF over alleged illegal constructions on disputed lands. Approximately 20,000 to 25,000 displaced persons, originally from the region but residing in Beirut's southern suburbs, had returned to their villages due to intensified conflict. Some of these individuals attempted to build on disputed lands or on their own properties without obtaining the necessary permits. The ISF intervened to demolish structures deemed as encroachments on private property. Local accounts varied, with some residents asserting that the constructions were on others' lands, while village council president Abbas Ali Zeaiter contended that the disputed buildings were erected by individuals on their own land but lacked proper permits. The incident underscores pre-existing inter-communal tensions in the Jbeil region, which is home to both Shiite and Christian majority villages.

<sup>240</sup> L'Orient-Le Jour. (2024, October 21). Agreement reached with police during eviction of displaced people in abandoned Hamra hotel. Retrieved from https://today.lorientlejour.com/article/1432274/agreement-reached-with-police-during-eviction-of-displaced-people-in-abandoned-hamra-hotel.html (accessed 10.02.25)

Asharq Al-Awsat. (2024, October 21). Lebanese police try to evict hundreds of displaced from abandoned building in Beirut. from https://english.aawsat.com/arab-world/5073391-lebanese-police-try-evict-hundreds-displaced-abandoned-building-beirut (accessed 10.02.25)

Souhaid expressed concerns about potential future unrest, fearing that displaced individuals might occupy uninhabited homes as colder weather approaches. Zeaiter, however, downplayed these concerns, stating that most displaced persons had rented properties and intended to return home once the conflict subsides.<sup>242</sup>

Additionally, the competition for limited job opportunities has intensified, leading to perceptions among host communities that IDPs are contributing to unemployment and wage suppression. These economic pressures have, at times, manifested in discriminatory attitudes and social exclusion, further deepening the divide between IDPs and host populations.<sup>243</sup> The renewed conflict has also reignited historical tensions between Palestinian and Lebanese communities. Narratives from past conflicts have resurfaced, leading to increased suspicion and hostility. In some areas, Palestinian IDPs have reported feeling unwelcome or facing discrimination from Lebanese residents, which hinders efforts to integrate and support displaced populations.<sup>244</sup>

Most political factions have exploited the displacement crisis to advance their agendas. Some groups have used the presence of IDPs to stoke fears about security and resource scarcity, thereby bolstering their support base. In certain cases, political leaders have portrayed IDPs as a threat to national stability, using this narrative to justify restrictive policies or rally their constituencies. This politicization of displacement exacerbates social divisions and hinders efforts to develop cohesive, inclusive responses to the crisis.<sup>245</sup>

Tensions have also emerged between Hezbollah and the Lebanese government regarding the management of displacement from the South. Disagreements over resource allocation, security measures, and the provision of aid have led to friction between these entities. Hezbollah's role in the conflict and its influence in certain regions complicate coordination efforts, as the government seeks to assert its authority while managing the complex dynamics of displacement. These internal conflicts impede the development of a unified strategy to address the needs of IDPs and host communities effectively.<sup>246</sup>

Finally, and for all of the above, security concerns have led the government to impose curfews and other restrictions targeting Syrian and Palestinian populations. These measures, intended to maintain public order, have sometimes resulted in the further marginalization of these communities. Curfews limit the ability of IDPs to access essential services, seek employment, or maintain social connections, thereby exacerbating their vulnerability.

spotlight/sectarianism-in-the-shadow-of-israels-war-on-lebanon (accessed 10.02.25)

<sup>242</sup> L'Orient-Le Jour. (2024, October 24). Displaced persons and police clash over illegal construction in Afqa. L'Orient-Le Jour. Retrieved from https://today.lorientlejour.com/article/1432807/displaced-persons-and-police-clash-over-illegal-construction-in-afqa.html (accessed 10.02.25)

<sup>243</sup> United Nations Office for the Coordination of Humanitarian Affairs (OCHA). (2024, June 27). Lebanon flash update #21: Escalation of hostilities in South Lebanon. Retrieved from https://www.unocha.org/publications/report/lebanon/lebanon-flash-update-21-escalation-hostilities-south-lebanon-27-june-2024 (accessed 10.02.25)

Reuters. (2024, October 15). Mass displacement in Lebanon war revives spectre of sectarian strife. Retrieved from https://www.reuters.com/world/middle-east/mass-displacement-lebanon-war-revives-spectre-sectarian-strife-2024-10-15 (accessed 10.02.25)

New Lines Magazine. (2024). Sectarianism in the shadow of Israel's war on Lebanon. Retrieved from https://newlinesmag.com/

<sup>246</sup> Reuters. (2024, October 15). Mass displacement in Lebanon war revives spectre of sectarian strife. Retrieved from https://www.reuters.com/world/middle-east/mass-displacement-lebanon-war-revives-spectre-sectarian-strife-2024-10-15

## **Blurred Boundaries**

Humanitarian Law and Displacement in the 2024 Lebanon Conflict