

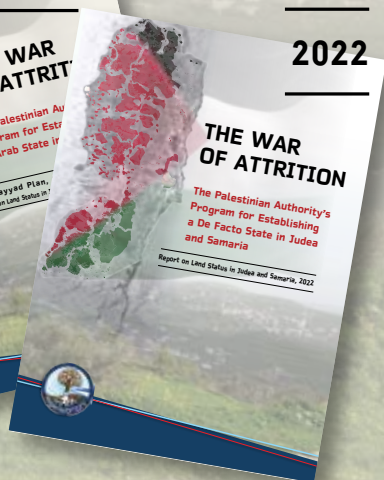
TURNING POINT

UPDATED SURVEY OF ILLEGAL CONSTRUCTION
IN JUDEA AND SAMARIA, 2024

2019



2022





Regavim (R.A) is a public movement dedicated to the protection of Israel's national lands and resources. The Regavim Movement acts to prevent illegal seizure of state land, and to protect the rule of law and clean government in matters pertaining to land-use policy in the State of Israel. The Regavim Movement is active in the public, parliamentary and judicial spheres, through publication of opinion and research papers, and through the dissemination of reports, policy and opinion papers, media communications and, when necessary, legal action. Regavim's activities are directed toward accomplishing one mission: Restoring the Zionist vision to its primary role in the Israeli policy process. As we see it, the Zionist vision is first and foremost an unapologetic Jewish vision, but at the same time it is a vision grounded in humanist values, justice, and morality - values expressed in strict adherence to high ethical standards and clean government.

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Duma, Binyamin Region

Executive Summary

Executive Summary: Illegal Arab Construction in Judea and Samaria

This report presents updated data and analysis in the ‘War of Attrition’ series, an ongoing study of illegal Palestinian Arab construction in Area C of Judea and Samaria. The study was first published in 2019¹ and updated in 2022.²

This document, the third in the series, reviews the scope of illegal Palestinian construction in the years 2022-2024.

As of May 2024, there are over 97,566 illegal structures built by Palestinian Arabs in Area C of Judea and Samaria, the region under full Israeli jurisdiction.

Regavim’s analysis and mapping of data collected using aerial photography bring three trends to light that have impacted the situation on the ground during this timeframe:

In the first period covered by the present study, April 2022 - January 2023, illegal construction trends continued the pattern we identified in previous years, with a slight moderation: We identified 4,065 new structures built during this period, an average of 452 new illegal structures per month. The data indicate that the illegal Palestinian construction boom documented in the previous study continued.

In the second period, from January 2023 to June 2023, there was another dramatic increase in Palestinian illegal construction: 3,038 new structures, an average of 608 new illegal structures per month, were built in this six-month span.

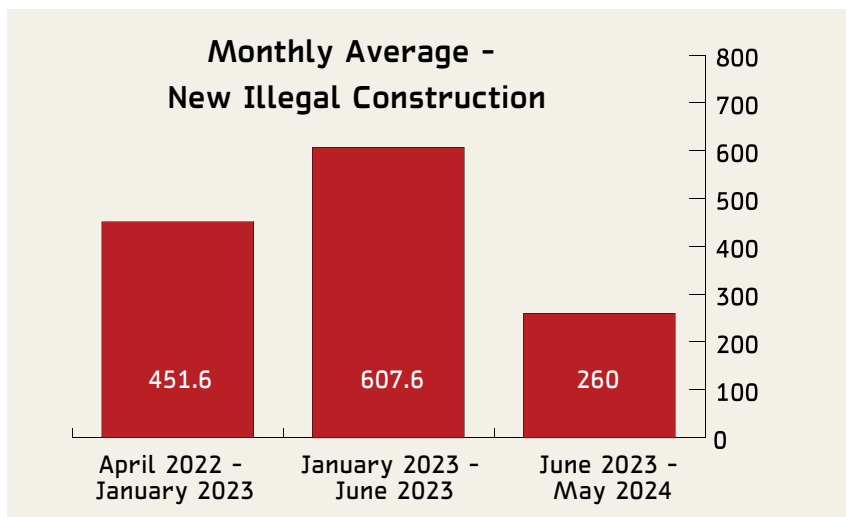
In contrast, in the third period, between June 2023 and May 2024, there was a dramatic decrease in new construction: only 2,853 structures were built, an average of 260 per month.

The significant increase in illegal construction in Area C between April 2022 and June 2023 can be attributed to the continuation of the Palestinian Authority’s construction race, which aimed to establish facts on the ground in the context of the Fayyad Plan for the establishment of a Palestinian state, in particular following the launch of US President Donald Trump’s “Peace to Prosperity” plan - also known as “the deal of the century.”

1 Regavim, 2020: “The War of Attrition: The Palestinian Authority’s Program for Establishing an Arab State in Area C,” <https://bit.ly/4grtHog>

2 Regavim, 2022: “The War of Attrition: Report on the Status of Land in Judea and Samaria, 2022,” <https://bit.ly/3NKPJq6>





This trend was exacerbated by the Israeli government’s willful neglect, which reached its peak under then-Minister of Defense Benny Gantz, who had a sympathetic attitude toward the Palestinian Authority and did not confront the Palestinian Authority on this issue. The results of Gantz’s policy continued to be seen and felt in the first months of the current government’s term. The combined effect of these factors resulted in one of the largest recorded spurts of illegal Arab construction: Our findings, published in “The War of Attrition 2022,” noted that in April of that year, illegal construction climbed to an all-time high of 7698 new illegal structures, a monthly average of 642 .

On the other hand, beginning in June 2023, we documented a sharp decline in the rate of illegal construction in Area C. This drastic drop may be explained, among other factors, by the tightening of Israeli policy toward illegal construction that was adopted by the government several months after it was sworn in - particularly in regard to enforcement.

An additional factor is the severe recession in the Palestinian Authority’s economy following the October 7th massacre and the outbreak of the Tekumah (National Rebirth) War (originally known as the ‘Swords of Iron’ War). A sudden drop in organized annexation activity, caused by the Palestinian



Authority's inability to dedicate resources to land seizure, occupation and annexation projects in Area C, was matched by a drop in private and local illegal construction initiatives due to economic constraints.

The data from the last period covered in the present study are encouraging, indicating a new approach on the part of decision makers. After years of an Israeli-sanctioned free for all and criminal neglect of the dangers posed by the burgeoning illegal construction, the first signs of change are visible on the ground.

The change of trend may be explained from a number of different vantage points:

1. Improved and increased enforcement - As opposed to earlier periods, the government's enforcement policy has begun to focus on enforcement against multi-story, industrial and commercial structures. In the past, enforcement was usually reserved for pre-fab and similar low-cost construction projects. The change of enforcement policy, which became operational in the months immediately following the installation of the present government, as well as increased activity and higher-profile presence of municipal land protection units and the resultant rise in real-time reporting of construction violations, contributed to the creation of deterrence throughout the region, and thus to a drop in construction starts.
2. Increased security presence in the area - During the Tekumah War, the Judea and Samaria region was defined as a secondary front, alongside the primary combat zones at Israel's northern and southern borders, resulting in an increased presence of IDF forces in the area. In addition, security policy became stricter than it had been in the past. Construction crime is no longer considered a minor or insignificant threat, as it had been in the past; this, too, has had an impact on the number of illegal construction starts.
3. Economic recession in the shadow of the war - Since the outbreak of the war, laborers from Judea and Samaria have been banned from entering the sovereign territory of Israel to work. The economic recession in Israel's economy in the shadow of the war is even more pronounced in the Palestinian Authority's economy, which relies largely on the Israeli economy. The significant decrease in the number of construction starts is one direct result of this deep recession.

It is important to emphasize that the new, and most welcome, downward trend in illegal construction is far from sufficient. Illegal Arab construction in Area C continues to run rampant even now, and at last count stands at 97,566 illegal structures, constituting a strategic threat to the State of Israel.

BACKGROUND



General Background: History of Illegal Arab Construction in Area C

In 1993, the Oslo Accords were signed between the Government of Israel and the Palestine Liberation Organization (PLO). The agreement served as an interim arrangement between the State of Israel and the Arabs of Judea and Samaria, and within its framework, the territory of Judea and Samaria was divided into three areas of control:

Area A: Approximately 17% of Judea and Samaria, including all of the Arab cities and some of the larger rural clusters, were transferred to the full control of the Palestinian Authority in both security and civil-municipal aspects.

Area B: Another 21% of the territory was placed under the civil jurisdiction of the Palestinian Authority, with security jurisdiction placed under control of the State of Israel.

Area C: The remaining area, under full civil and security jurisdiction of the State of Israel, constitutes nearly 60% of the territory.

Following the wave of deadly terror attacks of the Second Intifada, some of which were orchestrated by the Palestinian Authority (PA) itself, negotiations between the PA and the State of Israel were halted, and what had been envisioned as an interim situation under the Oslo Accords became entrenched. Under the cover of this situation, and in violation of the agreements, the Palestinian Authority initiated moves aimed at establishing a de facto Palestinian state throughout Judea and Samaria as a *fait accompli* by creating geographical facts on the ground that would tie Israel's hands politically and diplomatically.

In 2009, then-Prime Minister of the Palestinian Authority, Salaam Fayyad, announced a plan officially called 'Palestine - Ending the Occupation and Establishing the State..³ The plan was a declaration of active steps in the pursuit of "establishing an independent Arab state with full sovereignty over all the territories of the West Bank and the Gaza Strip within the 1967 borders, with Jerusalem as its capital." According to the Fayyad Plan, the establishment of the Palestinian state will be made possible, among other things, by creating territorial contiguity between blocs of settlement designated as Area B through massive construction and occupation/annexation of land in Area C.

3 Ending the Occupation, Establishing the State: Program of the Thirteenth Government. August 2009. <http://bit.ly/2toTdZH>.





Villa - Bidiya, Shomron



IDF Firing Zone 203

Although Israeli governments have long regarded the situation created by the Oslo Accords to be a fairly stable status quo, as far as the PA is concerned no such status quo exists. Particularly in the decade that followed the launch of the Fayyad Plan, constant, extensive, systematic changes have been effected on the ground in Judea and Samaria.

Beginning in 2008, on the eve of the unveiling of the Fayyad Plan, the Regavim Movement has been monitoring the rate of illegal Arab construction in Area C. Although this was not a new phenomenon at the time, with the launch of the Fayyad Plan it became a strategic tool used by the PA to create territorial contiguity with the aim of establishing a de facto Palestinian state. By 2022, when Regavim's most recent study of the situation on the ground was published, the number of illegal Arab structures in Area C had climbed to 87,610. Since then, and through May 2024, another 9,956 illegal Arab structures were added.

This report is the third in a series entitled “The War of Attrition: Report on the Status of Land in Judea and Samaria,” following studies published in late 2019, one decade after the launch of the Fayyad Plan, and a follow-up study published in 2022. The earlier installments in this series offered a wide-lens analysis of numerous aspects of Palestinian annexation of Area C. These included:

Population growth and illegal construction: Since 2009, there has been a concerted and focused effort to build tens of thousands of illegal structures in Area C, despite the fact that there are extensive land reserves available for construction and development in Areas A and B. The amount of land overtaken by illegal Arab construction in Area C has jumped by over 80%. In comparison, while the Israeli population of Area C has crossed the half million mark, the area taken up by Israeli construction rose by only 25% in the period between 2009-2022.

Population density: The average population density in the Arab sector in Area C is 5.78 persons/dunam (p/d), while in Areas A and B, population density is 5.58 p/d. In the Israeli sector of Judea and Samaria, population density is considerably higher, at 7.9 p/d, while population density within the green line stands at 10.04 p/d.

Agricultural annexation: Since 2012 the Palestinian Authority has invested heavily in occupying and annexing agricultural land in Judea and Samaria, exploiting loopholes in the legal framework that remains in force in this territory. This activity often involves thousands of dunams of land and is made possible by European support and funding for roadworks, tree planting and water infrastructure projects. Since the launch of the Fayyad Plan, some 200,000 dunams of Israel state land have been overtaken by the Palestinian Authority in this manner.

Land registration: Over the past several years, the Palestinian Authority has been conducting intensive and extensive survey and registration of land - including in Area C. Although the land registry that is being built has no formal standing or validity, its existence may create a legal challenge due to the fact that the State of Israel has no alternative registry to offer or upon which it may rely.

Lawfare: Hundreds of petitions and appeals have been filed by the Palestinian Authority as a means of preventing methodical enforcement by Israeli authorities. Ministry of Justice reports note that many of the legal cases result in extrajudicial agreements or arbitration of arrangements in which the petitioners are directed to request building permits, even in cases in which permits are extremely unlikely to be approved.

The trends analyzed in the earlier “War of Attrition” studies point to an ongoing, systematic, well-funded Palestinian program of land appropriation. In these earlier reports, we called upon the State of Israel to revise its approach and to formulate and implement long-term strategic policy initiatives to effectively counter Palestinian annexation.

More extensive discussion of these issues are available in the 2019 and 2022 “War of Attrition” reports. The current study will survey and analyze the changes in construction trends in the period between 2022 and 2024.

DATA



Illegal construction in Area C:

April 2022 – May 2024

As we have noted, The Regavim Movement investigates and examines trends in illegal construction in Area C of Judea and Samaria over time, and our research serves as a primary source of information, pooling data and making it publicly accessible. Our research methodology consists of manual analysis by our mapping experts, using the Geographic Information System (GIS), of aerial photographs commissioned from the Israel Mapping Center (MAPI). The data is reviewed and cross-checked for accuracy and precision in a multi-stage quality control process.

Between April 2022 and May 2024 we identified 9,956 new illegal Arab-built structures in Area C, an average of 398 new structures per month. However, there were significant variations in the rate of construction in different periods within the timeframe of this study, as will be detailed below.

The total number of new illegal structures built by the Palestinian Authority in Area C – the portion of Judea and Samaria under full Israeli civil and security jurisdiction – currently stands at 97,566 structures. This represents an increase of 12% as compared to our previous study, conducted in April 2022.

Analysis of the aerial photos reveals a clear trend in which the bulk of construction has shifted away from Areas A and B towards mass-scale illegal construction in the open spaces of Area C, with virtually no new development or construction within the boundaries of existing Arab villages. Another pronounced trend is the Palestinian Authority's focus on creating contiguity between villages through illegal construction, and construction along major traffic arteries, a strategy aimed at isolating Israeli communities that also threatens motorists.

As opposed to previous years, recent construction has very different characteristics. The structures are no longer prefabricated huts or simple dwellings. Instead, palatial villas, luxury vacation and leisure resorts, water parks and event halls, swimming pools and multi-story buildings have sprung up across the territory. Another distinctive feature is a surge of construction along the security “seam line,” a trend reported by the Regavim Movement in a policy paper published in early 2024.⁴ These trends reflect a new stage in the actualization of the Fayyad Plan's roadmap for unilateral establishment of a de facto Palestinian state.

4 See Regavim, The Palestinian Authority's Conquest of the Security Buffer Zone, 2023. <https://bit.ly/4gzDSaG>



As for Palestinian annexation efforts that rely on agricultural projects, in our War of Attrition study of 2022 we estimated the extent of agricultural land-grabs of state land, both registered to the State of Israel and “survey land” that has not yet been fully registered, at some 200,000 dunams. Agricultural use is the basis for ownership claims under Ottoman Land Law’s recognition of use and possession⁵ rights, and is therefore a significant method of annexation.



Duma, Binyamin Region

The current mapping project, reflecting the situation on the ground in 2024, does not include agricultural annexation, but we are able to extrapolate that the rate of agricultural annexation is commensurate with that of illegal construction. The location of agricultural projects of this kind prove that the Palestinian plan for annexation of Area C, as part of the larger plan to establish a de facto Palestinian state by creating facts on the ground, continues without interruption, with the encouragement and generous support of European countries and international organizations.⁶



Palatial villa - Nahalin, Gush Etzion

Another significant point of comparison regards Jewish population changes between the previous and current studies. Between May 2022 and May 2024, Israelis built 904 structures in Judea and Samaria without the requisite permits; some 9% of the number built by Palestinians. Accounting for the difference in population – the number of Palestinian Arabs living in Area C is estimated at 230,000 people and the number of Israelis is 520,000 people⁷ – the rate of illegal construction by Arabs is 22 times greater per person than the rate of illegal Israeli construction. The sum total of illegal structures in the Israeli sector of Area C is 5,614.

5 See Regavim, The War of Attrition, 2022, p. 21. <https://bit.ly/3NKPJq6>

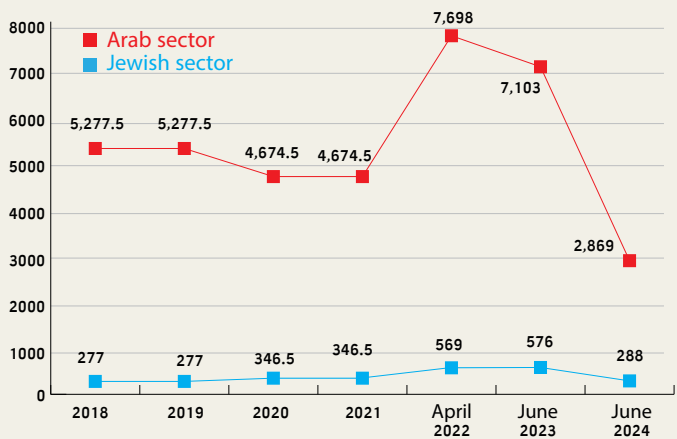
6 Ministry of Intelligence, 2021: “The Palestinian Battle for Area C: Shaping Security Reality on the Ground - Description and Analysis.” (Hebrew) <https://bit.ly/4gzqWBQ>

7 Population Data - Judea, Samaria and the Jordan Valley, January 2024 (Yesha Council, 18 Feb. 2024) <https://bit.ly/4fVpAA8>

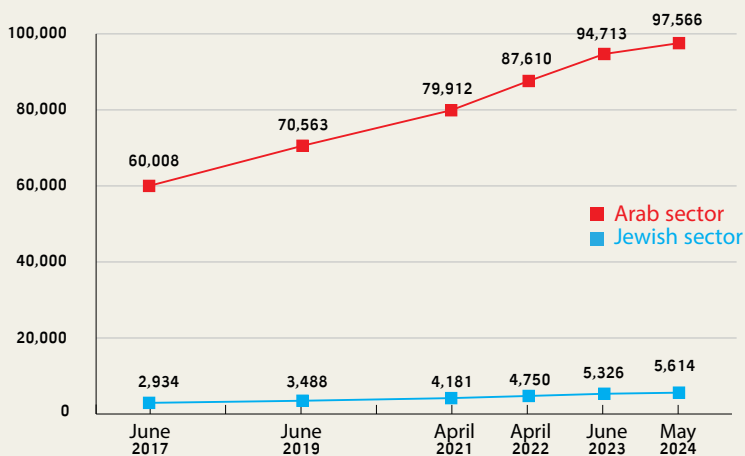
Periodic Analysis: Illegal Construction - Arab Sector, Area C

YEAR	TOTAL ILLEGAL STRUCTURES	NEW ILLEGAL STRUCTURES	AVERAGE RATE OF CONSTRUCTION/MONTH
2008	28,788		
June 2017	60,008	31,220	289
June 2019	70,563	10,555	440
April 2021	79,912	9,349	425
April 2022	87,610	7,698	642
January 2023	91,675	4,065	452
June 2023	94,713	3,038	608
May 2024	97,566	2,853	260

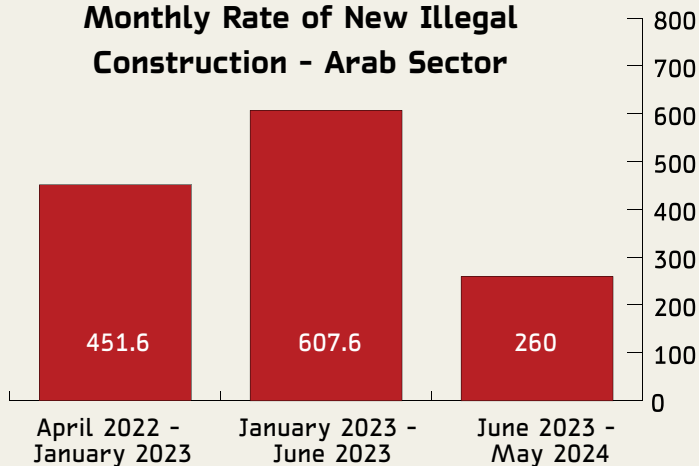
Annual Rate of New Illegal Construction in Area C



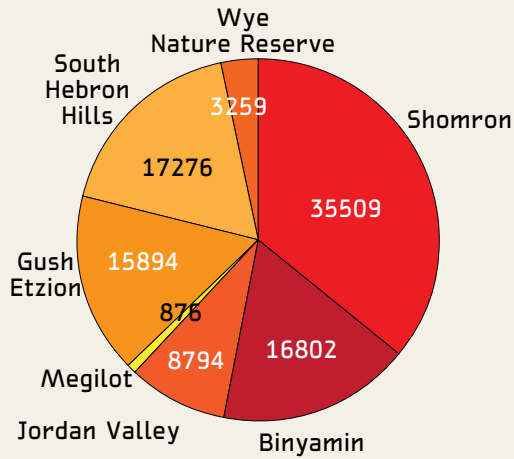
Cumulative Illegal Construction in Area C



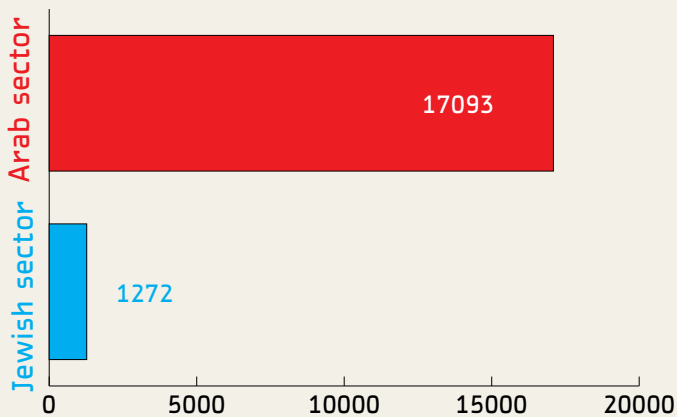
Monthly Rate of New Illegal Construction - Arab Sector



Illegal Construction by Region



New illegal construction, 2022-2024



Analysis of Trends



Period I: April 2022 - January 2023: The Upward Trend Continues

Between April 2022 and January 2023 the surge of illegal Arab construction in Area C continued. Over the course of this nine month period we documented 4,065 new illegal structures, an average of 452 per month. This constitutes a somewhat reduced monthly rate as compared to the previous year, when illegal construction starts reached a high of 642 new structures per month. The data indicates a significant upward trend in illegal construction that was only slightly offset by a slowdown in construction.

In the second edition of Regavim's War of Attrition study, we explained the spike in illegal construction as the result of the publication of US President Donald Trump's "Peace to Prosperity" ("Deal of the Century") plan in 2020.⁸ which proposed the establishment of a Palestinian state on 70% of the territory of Judea and Samaria. The borders proposed by the Deal of the Century were drawn roughly along the lines of Israeli and Arab construction in Area C as they stood at that time, proving the efficacy of the Fayyad Plan and spurring a surge of new Arab construction. It appears that even two years later the Palestinian Authority maintained this campaign of creating facts on the ground as a means of establishing an optimal position in the event that negotiations are resumed.

Furthermore, the obvious increase is also attributable to the Israeli government's policy of appeasement toward the Palestinian Authority during the tenure of Benny Gantz as Minister of Defense in 2020, and with even greater effect under the Bennett-Lapid government, from June 2021 - December 2022.

Gantz's tenure in the Ministry of Defense is also closely related to the rise in illegal construction. Gantz repeatedly declared his intention to strengthen the Palestinian Authority and his commitment to the two state solution.⁹ The policy of non-enforcement, and even more so the approval of Arab construction in Area C, directly fueled a surge in illegal Arab construction.

One illustrative case in 2021 saw Israeli government approval of plans for 1000 residential units, some of them adjacent to existing Jewish communities. This mass-scale Arab construction, the likes of which had not been approved by Israel for years, was one element of a larger program of "confidence-

8 See Regavim, The War of Attrition, 2022. <https://bit.ly/3NKPJq6>

9 YNET: 28 December 2021, "In surprise visit, Gantz hosts Palestinian leader at his private residence." <https://bit.ly/4fCXWrl>





Duma, Binyamin Region



IDF Firing Zone 203, Shomron

building measures.” News outlets reported that “the Palestinian Authority expressed satisfaction with its success in bringing the Israelis to accept this decision, which has ramifications on the political and policy level.” In addition, Gantz promoted post-facto legalization of illegal Palestinian construction: In July 2022, in preparation for US President Joe Biden’s visit to Israel, the Minister of Defense issued orders to grant legal status to 6 illegal Arab outposts, some of them situated on privately-owned Jewish land.¹⁰

Economic aid to the Palestinian Authority during the tenure of the Bennett-Lapid government indirectly encouraged illegal construction. At Gantz’s orders, during this period the Palestinian Authority received loans from the Israeli government of NIS 500 million as a means of circumventing the freeze of tax revenue transfers¹¹ and shoring up the Palestinian Authority. Tax revenues collected by Israel on behalf of the Palestinian Authority were frozen, under the law that prohibits transfer of funds that the Palestinian Authority uses to pay terrorists’ families. These were among a series of economic leniencies and outright gifts granted to the Palestinians during this period, including additional work permits for Palestinians in Israel.¹²

The Palestinian Authority’s annexation of Area C consumes tremendous resources; when the Palestinian Authority’s economic situation improves, the graph of illegal construction rises in direct correlation.

As we have noted, the “Government of Change” and Defense Minister Benny Gantz were responsible for an unprecedented rise in illegal construction.

10 Arutz 7, 30 October 2021: “Gantz approves additional Arab construction in Area C of Judea and Samaria.” <https://bit.ly/40fO6as>

11 Israel Hayom, 12 November 2021: “Is Israel funding PA’s ‘pay-for-slay’ program in violation of the law?” <https://bit.ly/4gMau00>

12 Haaretz, 12 April 2022: “Israel Plans to Grant Palestinians ‘Tens of Thousands’ More Work Permits, Gantz Says.” <https://bit.ly/41Wvv5a>





Wye Nature Reserve, Judean Desert



Villa - Mas-ha, Shomron

The general policy of appeasement toward the Palestinian Authority created the economic resources and favorable conditions for continued illegal construction whose stated purpose was the annexation of territory under Israeli jurisdiction. Gantz's term of office was disastrous in respect to the battle for Area C, and the lasting damage caused by the policy Gantz

implemented continues to cast a dark shadow over the State of Israel.

Period II: January 2020 - June 2024: Another Spurt of Construction

The months between January 2023 and June 2023 saw a dramatic leap in the rate of illegal construction, even when compared to the very high rate of the preceeding period. In only five months, 3,038 structures were built, an average of 608 illegal Arab structures per month, nearly unchanged from the peak under the Bennett-Lapid government. In our analysis, this very high rate is explained by the atmosphere of instability and the impotence of enforcement bodies in the period of transition between governments, and particularly by the shift in staffing of the Ministry of Defense, the ministry responsible for civilian enforcement in Judea and Samaria. The time that elapsed between the elections and the actual division of responsibilities within the Ministry of Defense between Yoav Gallant and Betzalel Smotrich, and the implementation of changes in the enforcement system, were fertile ground for the unabated spree of illegal Arab construction.

The void created by the Israeli authorities resulted in a noticeable increase in

illegal construction. Changes in Israel's enforcement policy, detailed below, had not yet impacted the situation on the ground.

Period III: June 2023 – May 2024: Drastic drop in construction

The 11 months from June 2023 to May 2024, saw a dramatic decrease in the volume of illegal Palestinian construction in Area C. Analysis of the latest aerial photographs (May 2024) shows only 2,853 new illegal structures. The monthly average for 2024 is 260 new structures, compared to 608 structures per month in 2023 (a decrease of 57%) and 547 per month in 2022 (a decrease of 52%). The number of new structures is less than half the number of structures built in the corresponding periods in each year from 2018 to 2023. During the period when record numbers were recorded, the year of the Bennett-Lapid government, illegal Palestinian construction averaged 642 new structures per month - 234% more than the in the most recent period covered in this survey. The data indicate an unmistakable, significant change of trend.

Compare this with illegal Jewish-sector construction in the past year: Our researchers found 288 new illegal structures built by Israelis in Area C, a monthly average of 24. Here too, there is a dramatic decrease of 26% from the previous measurement.

The significant shift in illegal construction trends is attributable to three factors which are detailed below:

1. **Changes in Israeli policy:** With the installation of the current government in December 2022, the State of Israel's official policy toward the Palestinian Authority has changed, and a more aggressive enforcement policy has been instituted by the Civil Administration regarding illegal construction. In the past, enforcement activity focused on temporary or inconsequential structures, while recent enforcement activity has focused on industrial, commercial and multi-story structures. The new policy approach also resulted in the launch of the Settlement Affairs Administration in the Ministry of Defense, which was given responsibility for enforcement against illegal construction in Area C. In a relatively short time, the new policy was implemented in practice, creating increased deterrence and a drop in illegal constructions starts.
2. **Increased security presence on the ground-** During the Tekumah (National



Rebirth) War, the Judea and Samaria region was defined as a secondary front, with the primary combat zones along Israel's northern and southern borders. In light of this designation, the presence of IDF forces was increased and more stringent security protocols were adopted, creating obstacles to illegal construction in Judea and Samaria that resulted in a decrease in illegal construction starts. In addition, after many years in which the Regavim Movement spearheaded demands for government action against illegal Arab construction and Palestinian Authority annexation, the Ministry of Settlement Affairs established land protection departments in municipalities throughout Judea and Samaria. Trained field officers began to patrol the open spaces within and adjacent to municipalities' jurisdictional "blue lines" and to file complaints and enforcement requests against construction violations in real time. This cooperation contributes to improved enforcement and increased deterrence against violators.

3. **Economic recession caused by the war** - The Palestinian Authority's economic situation was severely impacted by the outbreak of the war: Day laborers from PA-controlled areas were barred entry to Israel at the same time as the Israeli economy, upon which the Palestinian economy is dependent, suffered a slowdown. The economic crisis resulted in a drop in new illegal construction, hampering the progress of the PA's program of annexation of Area C.

As we have noted, the principle cause of the downward trend in illegal construction beginning in July 2023 is increased enforcement by Israeli authorities, the product of stringent enforcement protocols formulated and implemented by the Settlement Administration established by Minister Betzael Smotrich. In this context, it is important to note that as opposed to other Israeli enforcement bodies, the Civil Administration, which is responsible for law enforcement in Judea and Samaria, does not publish annual reports on enforcement that are available to the public. Israeli media reports from December 2024,¹³ cited otherwise Civil Administration enforcement data that were not publicly available; these reports painted a clear picture of significantly increased enforcement that coincides with the tenure of the current government, and a reduction in new construction starts.

According to the data presented in media reports, in the early months of 2024, Civil Administration enforcement teams demolished 602 illegal Arab-built structures, compared to 306 structures in all of 2023. Additionally,

13 See Israel Hayom, 6 December 2024: "Strategic step": Surge in demolitions of illegal Palestinian structures in Area C" (Hebrew) <https://bit.ly/4gGtb6t>; also see Israel Hayom, 18 December 2024, "A New Dawn in the Battle for Judea and Samaria." <https://bit.ly/4gBnDKm>





Dir Ibzia, Binyamin



In the buffer zone, Tulkarm, Shomron

in the first 10 months of 2024, 879 new illegal structures were documented, as opposed to 1,407 in the previous year and 1,528 in 2022, a drop of nearly 50% in new structures that reflects a greatly reduced rate of new construction.

According to other media reports,¹⁴ a new policy of immediate, real-time enforcement, including rapid demolition of new construction and hundreds of enforcement sweeps in which heavy machinery was confiscated from Arab contractors caught in the act of illegal construction. In addition, dialogue with village heads and community leaders aimed at directing new construction to areas within the boundaries of the Arab villages has contributed to the Civil Administration's efforts to more effectively mediate and implement the new policy. These actions have shown their effectiveness and contributed to a decrease in illegal construction.

A number of demolitions of large structures were reported in this period. Several multi-story structures in strategic, central locations were demolished, as opposed to enforcement in previous years that focused mainly on animal pens and shade structures, fences and light construction, usually in peripheral locations. One such large-scale demolition involving a massive structure on a central traffic artery in eastern Gush Etzion, was reported in the Israeli media: "In an attempt to block illegal construction: The Civil Administration has begun to demolish large Palestinian structures."¹⁵ In another case, an

14 Maariv, 15 November 2024 (Hebrew): "After years of steady growth in the rate of illegal Palestinian construction - a reversal."

15 Israel Hayom, 8 May 2024 (Hebrew): "In an attempt to block illegal construction, the Civil



unprecedented demolition of a “palace” - a six-story structure north of Efrat for which demolition orders had been issued in 2005.¹⁶ was carried out by the Civil Administration in May 2024. These cases illustrate the new trend of increased enforcement, which has had significant impact on illegal construction in this period.

The economic situation of the Palestinian Authority has apparently contributed to the significant downward trend in illegal construction. A United Nations Trade and Development (UNCTAD) report of September 2024 details “profound economic destruction ... the staggering scale of economic devastation and unprecedented decline in economic activity” in Palestinian Authority-controlled areas. According to the UNCTAD analysis, 2023 saw “an unprecedented 19% contraction in the fourth quarter. This sharp downturn resulted in an overall annual GDP decline of 1.9%.¹⁷ The Q4 figures stand in stark contrast to the first three quarters of 2023, in which a 4% growth of GDP was recorded. More than 300,000 Palestinian Arabs lost their jobs as a result of the war and the unemployment rate jumped from 12.9% to 32%

Administration has begun to demolish large Palestinian structures.” <https://bit.ly/4gInncx>

16 Makor Rishon, 20 May 2024: “Twenty years later, illegal ‘palace’ near Efrat demolished.” <https://bit.ly/4ib9PaL>

17 United Nations Trade and Development, 2024: Report on UNCTAD assistance to the Palestinian people. <https://unctad.org/publication/report-unctad-assistance-palestinian-people-0>

literally overnight.

According to this same report, the outbreak of the war also brought a significant decline in international economic aid to the Palestinian Authority. At the same time, the Israeli government began to garnish Palestinian Authority tax revenues, in accordance with the law requiring the government of Israel to withhold funds in the amount equal to PA support for terrorists and their families - a law that had not been enforced by previous governments but which Minister of Finance Smotrich activated. The data indicate a clear and direct connection between the PA's economic well-being and the rate of illegal construction in Area C.

The trend reflected in the data illustrates a clear and unequivocal connection between implementation of government policy directives and increased enforcement with the drastic drop in illegal construction. The data also clearly show that the economic weakening of the Palestinian Authority has had a direct impact on the decline in the Palestinians' ability to carry out hostile strategic moves against the State of Israel.

Despite the positive trend, the raw numbers indicate that the dangerous phenomena that have been the vanguard of Palestinian Authority annexation of Area C continue to pose a massive threat. It is therefore imperative that Israeli policymakers maintain and even increase political and economic pressure, alongside law enforcement efforts to combat illegal construction.





SUMMARY AND CONCLUSIONS



The Palestinian Authority's efforts to take over Area C continue, as a means of implementing the PA's stated goal of establishing a Palestinian state through de facto transfer of jurisdiction over territory from Israeli hands to the PA. Despite a welcome change in the rate of illegal construction reflected in the map of the situation on the ground as of May 2024, illegal Palestinian construction continues to expand and to threaten the State of Israel. This past year has seen a transformation of Israel's security policy in Gaza and along the northern border, and as of this writing the intensive combat that began over a year ago continues. Nonetheless, the critical and immediate threats to Judea and Samaria must not be neglected.

Public discourse regarding the collapse of the security paradigms and underlying concepts that for many years formed the basis of Israel's approach toward Hamas and Hezbollah must also be brought to bear on the question of Judea and Samaria and Israel's approach to the Palestinian Authority. We must hear - and internalize - what the other side says. We must take their declared objectives and plans seriously and ascribe the necessary weight to their intentions and actions.

The State of Israel must step up its aggressive, pro-active approach to the ongoing takeover of Area C, and directly address the Palestinian Authority's plan to create hostile Palestinian territorial contiguity from the lower Galilee and northern Samaria through Har Hebron and the Arad Valley to the Bedouin enclaves in the south.

Strategic threats require strategic responses. Over the course of nearly two decades, The Regavim Movement has studied the strategic threat posed by illegal construction, and has presented recommendations to decisionmakers for addressing this threat:¹⁸

- Complete the process of land survey and registration in Area C, mapping out strategic areas and completing the registration of state lands in the region.
- Expand activities that combat illegal construction, prioritize the battle against illegal agricultural annexation and promote forestation and agricultural projects that protect land resources.
- Establish a specialized security enforcement unit dedicated to the protection of open spaces in areas under Israeli jurisdiction in order to counter the Palestinian Authority's strategic plan for de facto annexation.

18 See "War of Attrition - 2022," Chapter 4. <https://www.regavim.org/wp-content/uploads/2022/10/War-of-Attrition-2022.pdf>

- Formulate a strategy to address the challenges of “lawfare” waged by the Palestinian Authority and foreign organizations. We can no longer afford to accept the intentional , malicious overwhelming of our judicial system.



Villa - Bidiya, Shomron

- Formulate a coordinated response by the Ministries of Foreign Affairs, Interior and Defense to the intensive involvement of foreign governments and organizations in pro-Palestinian activities that undermine Israeli interests.



Junkyard Route - Har Hebron

- With the understanding that the Israeli economy has made a consistent and direct contribution to illegal Palestinian construction, formulate alternative economic approaches and develop fiscal instruments that will facilitate the battle against illegal construction without harming the rehabilitation and growth of the Israeli economy, such as promotion of alternative sources of manual labor for the Israeli construction industry including employment incentives for the Israeli sector or expanded employment of foreign workers under more closely monitored conditions.

Israeli policy has changed course dramatically in a number of these areas, but it is our duty to expand and build upon the positive steps that have already been taken, particularly by promoting a systematic and long-range program for protecting the State of Israel’s land resources. The change of government in the United States, which is expected to bring in a more pro-Israel administration, presents unique opportunities for the State of Israel in many areas, including the battle against the de facto establishment of a hostile Arab state in the heart of the Land of Israel.



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