

Sent by email from Just Peace Advocates

September 14, 2026

Subject: **Research to support the implementation of Sanctions of Israel's illegal occupation**

Sent to:

Adrienne Ahn, Acting Deputy Director, Jordan, Egypt, Israel/Palestine (trade);

Nancy Bergeron, Deputy Director (political) - Israel, Palestine;

Rachna Mishra; Executive Director - Middle East Relations;

David Hutchison, Director General; Middle East Bureau

Ruwan Jayasuriya, Deputy Director □ Sanctions, Middle East Relations (EMA);

Violette R. Cassis, Deputy Director, Middle East Relations Division

Hoda Mroue, Hoda, Senior Desk Officer - Palestine;

Sylvain Razavi, Sylvain; Sanctions Analyst for International Trade

Thomas Vallée, Sanctions Officer,

Linda Bianchi, Director and General Counsel, Crimes Against Humanity and War Crimes Section, Department of Justice Canada

Cc: Minister Anita Anand, Minister Sean Fraser

Dear Global Affairs and Justice staff:

We are writing to provide information that may be helpful to you as you plan for sanctions against Israel, as announced on September 8.

We know many goods are being imported to Canada from illegal settlements. We also know there are many other avenues in which Canada is aiding and assisting Israel's illegal settlement enterprise. As you are aware, this occurs in violation of Canadian and international law. Not only are Israeli settlements illegal under international law, but they are also illegal under Canadian law through the Crimes Against Humanity and War Crimes Act and Geneva Conventions Act. Therefore, Canada is not only responsible for its complicity under international law, but also under Canadian law itself. Further, Canada has an obligation to ensure that violations of the Fourth Geneva Convention do not occur under any circumstance. When Canada or other signatories fail to do so, they themselves are complicit with war crimes.

For sanctions to be effective, they must address all aspects of Canadian support for Israel's illegal settlement enterprise in both occupied Palestine and the Syrian Golan.

Therefore, it cannot only be limited to the import and export of goods but must include services and other types of assistance.

Further, the sanctions must target the government of Israel directly. Israel's illegal settlement enterprise is not a project instituted by rogue actors but rather planned and enforced by the Government of Israel itself. As Gideon Levy, Israeli journalist, wrote in [Haaertz](#) on September 10:

"The settlements are Israel and Israel is the settlements...The settlement enterprise is an all-Israeli undertaking of the government and indeed the entire system. There is not a single official body not involved, directly or indirectly, either by action or by omission, undertaken with joy or with indifference."

As Levy further stated, "When Europe imposed sanctions on the occupied Crimean Peninsula, it also imposed sanctions on the occupier, Russia. How can you only punish the settlers without imposing penalties against those who initiated the settlements, fund them and defend and support them, namely the government of Israel?" This applies to Canada as well.

Banning settlement goods is one step, but it is just that. We need more, urgently. The Palestinian people cannot wait. The Canadian government must end all support of Israel's illegal settlement enterprise. This includes comprehensive sanctions which ban: the import or export of goods to illegal settlements (e.g., wine and medjoul dates), investments in companies participating in any activities in illegal settlements (e.g., CPP, PSPIB), two-way arms embargo to end support for the illegal military occupation, revoke charitable status of any organizations supporting illegal settlements and/or the Israeli military.

Canada is clearly aiding and assisting Israel's illegal occupation and all support must end, to bring Canada in line with Canadian and international law. Therefore, Canada must implement sanctions which cover:

- **Goods:** The import of settlement goods has been well-documented. This includes [wine](#), [medjoul dates](#), [dead sea mineral products](#), and [plastics](#). That being said, there are potentially many other goods that have not yet been documented, either do to lack of transparency on imported goods in general and/or because Israel regularly obscures the true origin of its products (this was well documented in [Global Echo's report](#)). Therefore, sanctions must include a method of enforcement that accounts for this deception and account for the whole supply chain. Regardless of which part, if any aspect of the goods are procured, grown, manufactured, etc., in an illegal settlement, they must be covered in any sanctions.
- **Investments:** This includes federal and provincial government investments including [CPP](#) and [La Caisse](#) (CDPQ), as well as other [public pensions](#) (e.g., HOOPP, OMERS, BCI, AIMCo, IMCO, PSPIB, OTPP, and Canada Post), federally regulated [banks](#) (e.g., Scotiabank, TD Bank, CIBC, RBC), and other public institutions like Canadian [universities](#).
- **Arms / Military Supplies:** Israel's illegal occupation of the Palestinian territory is a [military occupation](#). It is upheld and enforced through military violence including bombings, assassinations, torture, sexual violence, harassment, and surveillance. The Israeli military also continues to conduct a genocide in occupied Gaza, in violation of

the alleged ceasefire agreement and in violation of countless laws, including [provisional measures](#) provided by the International Court of Justice (ICJ). Gaza is part of the occupied territory and Israel has publicly stated they plan to re-establish settlements there after ethnically cleansing the Palestinian population. Therefore, sanctions must include a two-way arms embargo that ends all support for the Israeli military.

- **Services:** This refers to services provided to and/or received from Israeli businesses that are engaged, in any way, in supporting the illegal occupation. This applies to the Canadian government as well as businesses, charities, and any other institution registered and/or regulated in Canada. Canadian businesses operating in illegal settlements (e.g., [Aldo](#), [Metrontario](#)) must also be barred from ongoing operations (e.g., revoke Canadian registration).
- **Charitable Registration:** Countless charities send tax-payer subsidized funds to organizations supporting Israel's illegal occupation, including its military. Multiple of these [charities](#) have already had their charitable registration revoked. However, many others continue to send millions of dollars towards the illegal occupation. CRA audits take time and therefore sanctions that bar this type of illegal financial conduct are needed urgently. Some examples of these charities include [Mizrachi Canada](#), [United Israel Appeal of Canada](#), and [Israeli universities](#).
- **Sale of Palestinian Land in Canada:** Canadian sanctions must account for the illegal [sale](#) of Palestinian land at events in Canada. These events have occurred for at least the last 3 years and have yet to be stopped.

Canada must also end the "Canada-Israel Strategic Partnership MOU" which includes collaboration with and support to/from the Israeli government and military.

You may also find this report "[Stopping EU Trade with Israel's Illegal Settlements](#)" helpful if you have not seen it.

As determined by the International Court of Justice in its [July 2024 Advisory Opinion](#), the Israeli settlements, and the support by the State of Israel for the settlements, have been determined to be instrumental in imposing a range of gross human rights violations against the Palestinians under occupation, including:

- The denial of Palestinian self-determination;
- Two separate and unequal legal systems;
- The confiscation or requisitioning of Palestinian land;
- The exploitation of Palestinian natural resources;
- Discriminatory planning laws;
- The demolition of Palestinian homes;
- The source of sustained settler violence against the protected Palestinian population;
- The forced displacement of the protected Palestinian population; and
- The de jure and de facto annexation of the Palestinian Territory.

Action is needed immediately. We hope you find the links we have included on the specific research related to good, services, arms, charities and investments as useful as you consider the policy and specifics associated with implementing comprehensive sanctions on Israel's illegal settlement enterprise. We would be pleased to provide additional information as needed and/or meet with you to discuss further.

Sincerely,

Karen Rodman

Just Peace Advocates

www.justpeaceadvocates.ca

karen.rodman@justpeaceadvocates.ca