

Recommendations

EU-level differentiation measures:

1. **Launch a comprehensive technical review of EU-Israel relations across relevant commission directorates-general** by an inter-service group to ensure the full and effective implementation of EU differentiation requirements across the entire range of bilateral dealings with Israel. This should also address missing territorial clauses in [European Commission Implementing Regulations](#). Where deficiencies are identified, work to elaborate appropriate technical or regulatory fixes.
2. Ensure that EU differentiation requirements are systematically addressed at **EU-Israel subcommittee meetings** and reported to member states.
3. Discuss further in EU council working groups how best to implement UNSCR 2334 provisions and **exchange best practices**, including the possibility of the EU and member states voluntarily **transmitting a report to the UN secretary general** on their implementation of differentiation measures.
4. **Resume regular audits by the European Commission's DG SANTE** to verify whether Israel continues to abide by its commitment to enact and provide institutional guarantees of its own differentiation measures to meet EU requirements, including within Israeli domestic poultry and dairy processing lines.
5. **Publish an EU-level advisory** to strengthen awareness among EU citizens and businesses on the risks of business activities in the settlements, including financial transactions, investments, purchases, procurements, and services.
6. **Review the 2004 technical arrangement** between Israel and the EU to address ongoing deficiencies and ensure that settlement products do not benefit from preferential treatment under the EU-Israel Association Agreement. Devise a new proposal to replace the 2004 Technical Arrangement with a more efficient, reliable, and legally adequate mechanism. This should oblige Israeli exporters to correctly designate the origin of settlement products prior to their entry to the EU market and remove the administrative burden of monitoring and enforcement currently placed on member state customs authorities.
7. **Publish guidelines for tour operators** to prevent support for settlement businesses in East Jerusalem and the West Bank. Ensure that tour packages sold within the EU, and related tourism advertisements, correctly identify East Jerusalem and West Bank locations (such as East Jerusalem and Bethlehem) as the Occupied Territories – OPT (and not Israel), in line with existing regulations relating to consumer protections and advertisement standards.
8. **Ensure the non-applicability of the European Commission's existing "adequacy decision"**, currently under review, for data transfers to settlement-based entities.

9. Tighten the European Commission 2013 **funding guidelines** to exclude Israeli public authorities (ministries and government agencies) located in the OPT, such as Israel's Ministry of Science and Technology and Antiquities Authority, from grants, prizes, and financial instruments funded by the EU.
10. Ensure that **twinning programmes** with Israel do not directly or indirectly benefit settlements, building on the EU's 2018 commitment that twinning programmes should contribute to the two-state solution.
11. Require Israeli settlement products to obtain EUR.1 movement certificates issued by the Palestinian Authority – replicating measures taken by the EU in relation to products from Northern Cyprus and Crimea.

National-level differentiation measures:

12. **Publicly clarify that all existing bilateral agreements with Israel are inapplicable to the OPT. Systematically include territorial clauses in all future member state agreements with Israel** modelled on EU practice. Governments should also ensure that these positions are correctly implemented by their domestic authorities. This could be done in a coordinated way among a group of willing member states.
13. **Ensure full compliance with the European Commission's 2015 labelling guidelines**, including through targeted controls of importers and retailers selling settlement products.
14. **Replicate the European Commission's 2013 funding guidelines at member state level** to ensure that Israeli settlement entities are fully excluded from member state financial instruments and grants.
15. **Review the validity within member state jurisdictions of certificates**, including higher education certificates and property deeds, issued by Israeli entities established in the OPT or on the basis of Israel's application of its legislation to the OPT.
16. **Review whether financial support given by registered charities to settlement-linked entities and activities serves a legitimate charitable purpose** under member state tax rules and charity regulations; and whether this contravenes international law. This could include removing charitable organisations from tax-deductible gifts schemes – as [Norway](#) has done.
17. **Raise awareness among public bodies and private actors of the legal risks associated with financial transactions, investments, purchases, and procurements** linked to Israeli settlement activities. This can build on existing [member state business advisories](#) and should highlight the imposition of double taxation requirements and the non-recognition of contributory pension entitlements acquired through a beneficiary's employment by an Israeli operator established in the OPT.
18. **Open a discussion among like-minded member states on a unified and consistent approach to the provision of consular services** (especially visa applications) to residents of settlements by member state consulates in Tel Aviv and Jerusalem/Ramallah in line with Article 6 of the EU Visa Code and following the EU visa/passport policy on Crimea and Donetsk and Luhansk regions.

19. **Support the UN database of companies involved in settlements** and push for its continued updating, so that companies can be added or de-listed as appropriate.

Sanctions:

20. **Exclude all settlement products and related financial services.** Additionally, prohibit nationals and domiciled companies from buying real estate or entities, financing companies, and supplying services in relation to the settlements. This would replicate EU restrictive measures in response to Russia's annexation of Ukrainian territory.
21. **Deny entry** to known Israeli citizens who have engaged in, or called for, violent acts (including 'Price Tag' attacks) against Palestinians as well as those suspected of human rights abuses. As a first step towards this, EU and member state delegations in Jerusalem could be charged with identifying known individuals via the Schengen Information System.
22. **Impose asset freezes and travel bans** against, or make persona non grata: officials of regional settlement councils in the West Bank; and Israeli government officials involved in planning and implementing annexation measures.