

## Advocacy Document

Rejection of the Mechanisms for Coordinating the Entry of Goods into the Gaza Strip and the Call for a Professional, Transparent, and Fair Mechanism.

Chambers of Commerce, Industry and Agriculture – Gaza Strip

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### 1- Background and General Context

Since the outbreak of the prolonged war (2023–2025), the private sector in the Gaza Strip has faced unprecedented restrictions on trade movement and the flow of goods, under a complex system of constantly changing mechanisms governing the entry of commercial and humanitarian commodities. These mechanisms past and present alike have been characterized by a lack of transparency, the absence of clear standards, the restriction of imports, and the opening of space for monopolistic practices and the imposition of unlawful levies. This has led to the weakening of the local economy and has threatened the continuity of thousands of businesses.

On 8 December 2025, a new mechanism for the entry of humanitarian goods through the private sector was announced. However, based on traders' testimonies and the results of the public poll, this mechanism failed to address the existing structural imbalances. On the contrary, it has exacerbated them through the following measures:

- o Import is restricted to 10 Palestinian traders from only 4 Israeli suppliers.
- o Limiting imports exclusively to the Israeli market.
- o Reinforcing monopolistic practices and increasing the cost of access to goods.
- o Increase in bureaucratic procedures

In line with their representative and national responsibility, the Chambers of Commerce, Industry, and Agriculture in the Gaza Strip launched a public poll to assess traders' positions and views, document the economic impact, and formulate a collective stance grounded in a clear, quantitative database.

### 2- Executive Summary

This paper presents the results of a comprehensive quantitative survey conducted by the Chambers of Commerce, Industry, and Agriculture in the Gaza Strip, covering 366 private sector companies and establishments across all governorates of Gaza. The findings demonstrate that the mechanisms coordinating the entry of commercial goods and humanitarian commodities particularly those implemented after 8 December 2025 have led to structural distortions in the market, restricted access, a lack of transparency, and the widespread imposition of unlawful fees and levies.

The data indicate that 82% of surveyed traders rated the current mechanism as very poor, while 93% confirmed the absence of clear and transparent criteria. Furthermore, 85% of participating traders warned that restricting imports to a limited number of Palestinian and Israeli traders reinforces monopolistic practices, drives up prices, undermines competition, and threatens the continuity of economic activity.

This paper calls upon United Nations agencies, humanitarian actors, and international partners to refrain from engaging in or contributing to the entrenchment of monopolistic coordination models, and instead to support a professional, inclusive, and market-neutral coordination mechanism that aligns with international humanitarian and economic standards.

### **3- Sample Characteristics**

The survey sample consisted of 366 private sector establishments and companies in the Gaza Strip, representing a broad spectrum in terms of size, economic activity, and geographic distribution, thereby providing a reliable reflection of the structure of the local market. Small and medium-sized enterprises constituted the overwhelming majority of the sample (86%), as these are the actors most affected by access restrictions and monopolistic practices.

Participants' economic activities were diverse, with a notable concentration in essential goods, food security, and production sectors, which lends particular significance to the findings in assessing the impact of the mechanisms on the population's vital needs. The sample covered all governorates of the Gaza Strip, with a relative concentration in Gaza City as the primary commercial hub. Additionally, 92% of respondents were members of the chambers of commerce, further enhancing the representativeness of the results and their institutional credibility.

**(For further details on the characteristics of the sample, see Annex A)**

### **4- Key Survey Results**

The survey results indicate that the vast majority of participating private sector companies believe that the mechanisms governing the entry of commercial goods and humanitarian supplies into the Gaza Strip, particularly after 8 December 2025 face fundamental challenges related to efficiency and transparency.

Specifically, 82% of respondents rated the current mechanism as very poor, while 93% pointed to a lack of clarity in the criteria regulating it.

A high proportion of companies also reported having heard of the imposition of illegal fees or levies, with a large number having been exposed to such practices either directly or indirectly.

The majority further affirmed that these practices have a severely negative impact on the continuity of business activities.

The Results also show that most participants consider the new mechanism to be worse than the previous one, and believe that restricting imports to a limited number of traders undermines competition and affects price levels. In this context, respondents expressed broad support for action by chambers of commerce toward reviewing the existing mechanisms and advocating for the adoption of arrangements that are more inclusive and transparent.

**(For further details on the characteristics of the sample, see Annex B).**

## 5- Core Issues in the Current Mechanisms

**Based on the survey results, the main issues can be summarized as follows:**

- o Absence of the principle of equal opportunity in access to importation.
- o Violation of the principles of free trade and fair competition.
- o Conflicts of interest and lack of accountability.
- o Imposition of illegal financial burdens on the private sector.
- o Turning humanitarian assistance into a tool for market distortion.

## 6- Normative and International basis for Advocacy

**This paper is grounded in international principles and standards, most notably:**

- o The United Nations Guiding Principles on Business and Human Rights (UNGPs).
- o Standards of transparency, accountability, and non-discrimination in supply chain management.
- o Principles of the humanitarian economy and the “Do No Harm” approach.
- o The right to work and to trade as part of economic and social rights

## 7- Key Demands

**The Chambers of Commerce, Industry, and Agriculture, supported by the near-unanimous consensus of traders, call for the following:**

- o The immediate repeal of the current mechanisms for coordinating the entry of humanitarian goods through the private sector, which restrict importation to a limited number of traders.
- o Opening importation to all qualified traders in accordance with clearly announced professional criteria.
- o Allowing the entry of all materials and commodities without restrictions, particularly those required for recovery and reconstruction, such as raw materials, production inputs, energy, fuel, agriculture-related supplies, and others.
- o Separating the humanitarian track from the commercial track and preventing the use of aid as a tool of monopoly.
- o Adopting transparent and written coordination standards, including clear conditions, defined timelines, and an independent grievance mechanism.
- o Prohibiting illegal levies and fees and holding the entities involved accountable.
- o Involving chambers of commerce and private sector representatives in the design and oversight of any new mechanism.

## **8- Advocacy Messages**

### **8-1- Messages Addressed to the United Nations and Its Agencies**

- o The current mechanisms for coordinating the entry of goods into Gaza are not market-neutral and undermine humanitarian impact.
- o Restricting importation to a limited number of traders leads to monopolization and rising prices, negatively affecting citizens.
- o Survey data document a systematic lack of transparency and the prevalence of illegal levies.
- o Any UN engagement should avoid conferring legitimacy on market distortions.

### **8-2- Messages Addressed to International Donors**

- o Funding models linked to restrictive coordination mechanisms inadvertently fuel monopolistic control of the market.
- o 81% of companies face an existential threat as a result of the current mechanisms.
- o Supporting equitable access to trade constitutes a highly effective humanitarian intervention.
- o Donors have a decisive role in enforcing standards of transparency and inclusiveness.

### **8-3- Messages Addressed to International Humanitarian Organizations**

- o Humanitarian coordination through designated traders contradicts the "Do No Harm" principle.
- o The duality of humanitarian and commercial channels distorts prices and weakens availability.
- o Expanding the base of commercial access enhances market resilience and reduces reliance on aid.

### **8-4- Messages Addressed to International Media**

- o Trade in Gaza is subject to non-transparent mechanisms that benefit a few at the expense of the majority.
- o 98% of traders reported the existence of illegal fees or levies.
- o Market distortions increase humanitarian needs rather than reduce them.

### **8-5- Messages Addressed to Legal and Human Rights Bodies**

- o Restrictive coordination practices may amount to economic coercion and collective harm.
- o The data provide a strong foundation for legal and human rights accountability pathways.
- o The right to work and to fair competition is subject to systematic violation.

## Annex (A)

### Detailed Sample Characteristics

#### A-1- Type of Company

The data on the type of commercial registration for the survey sample, which consists of 366 establishments, indicate a clear diversity in the legal frameworks of the participating entities. Private joint-stock companies constituted the largest share, with 144 establishments (39%), followed by general partnerships with 102 establishments (28%), and then sole proprietorships with 93 establishments (25%). In contrast, public joint-stock companies accounted for a limited proportion of 6%, totaling 21 establishments. Other categories represented a marginal share not exceeding 2%, reflecting the dominance of private and medium-sized enterprises within the study sample.

Type of Commercial Registration	Number	Percentage
Sole Proprietorship	93	25%
Partnership	102	28%
Private Joint-Stock Company	144	39%
Public Joint-Stock Company	21	6%
Other (registration type not specified)	6	2%
<b>Total</b>	<b>366</b>	<b>100%</b>

## A.2. Geographical Distribution:

The geographical distribution of the survey sample shows a clear concentration of companies in Gaza Governorate, accounting for 70% of the total respondents, as it represents the main commercial and economic hub in the Gaza Strip. The sample also included companies from North Gaza at 16% and Khan Younis at 9%, in addition to limited representation from the Middle Area at 4% and Rafah at 2%. This distribution reflects the geographical spread of commercial activity across the various governorates of the Gaza Strip, while the greatest concentration remains in areas with higher economic density.

The chamber to which the company belong	Number	Percentage
Gaza	243	70%
North Gaza	54	16%
Middle Area	15	4%
Khan Younis	30	9%
Rafah	6	2%
<b>Total</b>	<b>348</b>	<b>100%</b>

The data on company size within the survey sample indicate that the majority belong to the medium-sized and small enterprise categories. Medium-sized companies constituted the largest share, with 183 companies (50%), followed by small companies with 129 companies (36%). In contrast, large companies accounted for 54 companies (15%), reflecting the predominance of small and medium-sized enterprises within the sample

Company Size	Number	Percentage
Small (1-9 employees)	129	36%
Medium (10-49 employees)	183	50%
Large (50 employees or more)	54	15%
<b>Total</b>	<b>366</b>	<b>100%</b>

#### A.4. Nature of Economic Activity

The data on the nature of the companies' activities for the survey sample indicate a diversity of participating economic sectors. Activities related to food products accounted for the largest share at 30%, representing 111 companies. This was followed by non-food products at 12% (45 companies), and industrial/production supplies at 11% (39 companies). Meanwhile, clothing and footwear and the technology and energy sector recorded lower shares of 7% (24 companies) and 5% (18 companies), respectively. This distribution reflects sectoral diversity with a notable concentration in consumer-oriented activities. The remainder of the sample was distributed across other activities, totaling 129 companies (35%).

Nature of Company Activity	Number	Percentage
Food Products	111	30%
Non-Food Products	45	12%
Clothing and Footwear	24	7%
Industrial / Production Supplies	39	11%
Technology and Energy	18	5%
Other	129	35%
<b>Total</b>	<b>366</b>	<b>100%</b>

## Annex (B) Survey Results

### B.1. Assessment of the Current Mechanism

Has your company previously or currently been subject to any security or technical assessment or screening in order to obtain approval for the entry of commercial goods into the Gaza Strip?

The survey sample results revealed variation in companies' responses regarding their exposure to security or technical screening procedures. A total of 177 companies (49%) of the participating firms reported that they had undergone such assessments, while 186 companies (51%) indicated that they had not been subject to any security or technical evaluation or screening.

Response	Number	Percentage
Yes	177	49%
No	186	51%
<b>Total</b>	<b>363</b>	<b>100%</b>

### How do you assess the current mechanism for the entry of commercial goods into the Gaza Strip?

The survey results showed a clearly negative assessment by companies of the current mechanism adopted for the entry of commercial goods into the Gaza Strip. The overwhelming majority of companies, 294 firms, representing 82% of the total sample, reported that the current mechanism is very poor. In addition, 45 companies (13%) described it as weak, while only 15 companies (4%) considered it acceptable. By contrast, a very limited proportion of companies only 6 firms (2%), indicated that the current mechanism is good.

Response	Number	Percentage
Good	6	1%
Acceptable	15	4%
Weak	45	13%
Very poor	294	82%
<b>Total</b>	<b>360</b>	<b>100%</b>

### Do you consider the current mechanism to be transparent and based on clear criteria?

The majority of participating companies believe that the current mechanism for the entry of commercial goods into the Gaza Strip lacks transparency and clear criteria. A total of 333 companies, representing 93% of the sample, reported that the mechanism is neither transparent nor based on clear standards. In contrast, 21 companies (6%) indicated that it is transparent and based on clear criteria to some extent, while only 6 companies (2%) stated that the current mechanism is transparent and clearly defined.

Response	Number	Percentage
Yes	6	1%
To some extent	21	6%
No	333	93%
<b>Total</b>	<b>360</b>	<b>100%</b>

**Have you heard about the imposition of levies or illegal fees in exchange for allowing the entry of goods, whether under the previous or the current mechanism?**

The survey results indicate that the vast majority of companies reported having heard about the imposition of levies or illegal fees in exchange for allowing the entry of goods. A total of 357 companies, representing 98% of the sample, answered "yes". By contrast, only 6 companies (2%) reported that they had not heard of such practices.

Response	Number	Percentage
Yes	357	98%
No	6	2%
<b>Total</b>	<b>363</b>	<b>100%</b>

**Have you been subjected to the imposition of levies or illegal fees in exchange for allowing the entry of goods, whether under the previous or the current mechanism?**

The survey sample results indicate that a large proportion of companies reported having been subjected to the imposition of levies or illegal fees in exchange for the entry of goods. A total of 138 companies (38% of the overall sample) stated that they were exposed to such practices directly, while 165 companies (46%) reported being exposed to them indirectly. In contrast, only 57 companies (16% of the sample) indicated that they had not been exposed to such practices.

Response	Number	Percentage
Yes, directly	138	38%
Yes, indirectly	165	46%
No	57	16%
<b>Total</b>	<b>360</b>	<b>100%</b>

### If the answer is yes, how do you assess the impact of this on your business activity?

The survey results show that the imposition of levies and illegal fees has had a profoundly negative impact on companies' business activities. A total of 267 companies (81% of the sample) reported that the impact was catastrophic and threatens the continuity of their business operations. In addition, 60 companies (18%) indicated that the impact was significant, while only 3 companies (1%) stated that the impact of these practices was limited.

Response	Number	Percentage
Limited impact	3	1%
Significant impact	60	18%
Catastrophic impact threatening business continuity	267	81%
<b>Total</b>	<b>330</b>	<b>100%</b>

### B.2. Assessment of the New Mechanism

#### Are you familiar with the new mechanism (post-8 December 2025) for the entry of humanitarian goods through the private sector?

The results reveal variation in companies' level of awareness of the new mechanism for the entry of humanitarian goods through the private sector. A total of 162 companies (45% of the sample) reported that they are familiar with the new mechanism, while 126 companies (35%) indicated that they are aware of it to some extent. Meanwhile, 75 companies (21%) stated that they are not familiar with the new mechanism.

Response	Number	Percentage
Yes	162	45%
To some Extent	126	35%
No	75	21%
<b>Total</b>	<b>363</b>	<b>100%</b>

### How do you assess the new mechanism compared to the previous one (pre–8 December 2025)?

The survey results indicate that most companies do not perceive any improvement in the new mechanism compared to the previous one. A total of 156 companies (43% of the sample) reported that the new mechanism is much worse than its predecessor, while 78 companies (22%) stated that it is worse than the previous mechanism. In addition, 114 companies (32%) indicated that there is no difference between the two mechanisms. By contrast, only a very limited proportion of companies, 12 firms (3%), considered the new mechanism to be better than the previous one.

Response	Number	Percentage
Better	12	3%
No difference	114	32%
Worse	78	22%
Much Worse	156	43%
<b>Total</b>	<b>360</b>	<b>100%</b>

### Restricting imports to a limited number of Palestinian and Israeli traders:

The survey sample results show that the overwhelming majority of companies believe that restricting imports to a limited number of Palestinian and Israeli traders leads to multiple negative consequences. A total of 309 companies (85% of the sample) reported that such restriction collectively results in monopolization, price increases, and weakened competition. In addition, 39 companies (11%) indicated that it leads to monopolization only, while 9 companies (2%) stated that it results in price increases, and 6 companies (2%) reported that it leads to weakened competition.

Response	Number	Percentage
Monopolization	39	11%
Price increases	9	2%
Increased competition	6	2%
All of the above	309	85%
<b>Total</b>	<b>363</b>	<b>100%</b>

### What is your opinion on coordination through humanitarian organizations in exchange for high financial fees?

The survey results reveal widespread rejection among companies of the practice of coordination through humanitarian organizations in exchange for high financial fees. A total of 243 companies (66% of the sample) reported that this approach is completely unacceptable, while 120 companies (33%) indicated that it is unacceptable but imposed as a matter of de facto reality. By contrast, only 3 companies (1%) reported that they were unaware of the issue or did not have a clear opinion, and no company expressed approval of this approach.

Response	Number	Percentage
Completely unacceptable	243	66%
Unacceptable but imposed as a de facto reality	120	33%
Acceptable	0	0%
I do not know	3	1%
<b>Total</b>	<b>366</b>	<b>100%</b>

### B.3. Attitudes and Positions:

#### Do you support the chambers of commerce taking action to confront this mechanism?

The results of the survey sample indicate broad and strong support for the chambers of commerce to take action to confront the mechanism currently in place. A total of 351 companies, representing 96% of the sample, reported that they strongly support such action by the chambers of commerce. In addition, 15 companies (4%) indicated that they support this action. No company expressed a neutral or opposing position toward the chambers' action, reflecting an almost unanimous consensus among companies on the importance of this role.

Response	Number	Percentage
Strongly support	351	96%
Support	15	4%
Neutral	0	0%
Do not support	0	0%
<b>Total</b>	<b>366</b>	<b>100%</b>

### Which tools do you consider the most effective? (Multiple Responses allowed)

The survey results show variation in companies' assessments of the most effective tools for confronting the mechanism. A total of 276 companies, representing 75% of the sample, indicated that media pressure and legal actions are among the most effective tools. Additionally, 246 companies (67%) pointed to coordination with United Nations organizations as having notable effectiveness, while 213 companies (58%) considered official correspondence to be an effective tool. Furthermore, 207 companies (57%) believed that international advocacy plays an effective role in this context, whereas 159 companies (43%) considered engagement with the ten traders to be a potentially effective tool.

Response	Number	Percentage
Media pressure	276	75%
Engagement with the ten traders	159	43%
Official correspondences	213	58%
International advocacy	207	57%
Coordination with UN organization	246	67%
Legal actions	276	75%
<b>Total</b>	<b>366</b>	<b>100%</b>

#### **B.4. Proposals and Recommendations:**

At the conclusion of the survey, two open-ended questions were allocated to participating traders with the aim of obtaining deeper insights into issues that were not addressed through the closed-ended questions. These questions provided traders with an opportunity to express their views more freely. Below is a summary of participants' responses to these two open-ended questions, intended to present a comprehensive understanding of dimensions that may not be fully captured through closed-ended responses.

#### **In your opinion, what are the most important amendments required to the goods entry mechanism?**

- o Reverting to the mechanism in place prior to 7 October 2023, as it was considered more equitable, transparent, and efficient in facilitating the entry of goods.
- o Opening import activities to all licensed traders and companies, each according to their field of specialization, and preventing the restriction of imports to a limited number of traders.
- o Abolishing monopolistic practices and unlawful financial coordination arrangements, and ensuring freedom of trade and fair competition in a manner that contributes to lowering prices.
- o Allowing direct importation without intermediaries, and permitting the entry of goods under the names of traders, as was previously practiced.
- o Reinstating an official Palestinian body to oversee coordination (the Ministry of National Economy, chambers of commerce, or an independent national coordination committee).
- o Enhancing transparency and clarity of criteria in import procedures, and separating the commercial track from the humanitarian track.
- o Expanding the list of permitted goods and easing administrative restrictions in line with market needs.
- o Guaranteeing the right to free trade in accordance with international laws and norms, while strictly enforcing the law against any violations without imposing collective penalties on all trader.

### **Do you have any additional proposals or remarks you would like to convey?**

- o Opening the crossings and restoring normal conditions as they were prior to the war (7 October 2023), and considering this the primary entry point to ending monopoly practices and commercial chaos.
- o Opening import activities to all registered traders and companies without restrictions or quota-based allocations, and ensuring freedom of trade and fair competition in the interest of citizens.
- o Abolishing coordination arrangements, illegal levies, and brokers, and recognizing these practices as unlawful, as they place an excessive burden on both traders and consumers alike.
- o Strengthening the role of chambers of commerce as the sole reference body for traders through formal coordination, supervision of goods entry, and price monitoring.
- o Activating official Palestinian frameworks (the Ministry of National Economy, the Goods Coordination Committee, and the Presidential Committee) to engage with the entities responsible for managing the crossings.
- o Applying legal and media pressure at the local and international levels through legal actions, media campaigns, and press conferences to expose monopolistic and unlawful practices.
- o Holding monopolists and those involved in exploiting the crisis accountable, including publishing names, taking legal and financial measures, and preventing them from continuing to import.
- o Enhancing internal solidarity and public awareness through coordinated strikes, general meetings of traders, and educating citizens about the impact of these mechanisms on the economy and prices.