

January 23, 2024

Secretary of State Antony Blinken
Secretary of Commerce Gina Raimondo

Dear Secretary Blinken and Secretary Raimondo,

We are writing to voice our concern about the massive numbers of small arms that the U.S. is exporting to Israel, and the violence and human rights violations that have and will continue to occur as a result of these exports. These violations are the result of extensive proliferation of weapons to Israelis who live in the occupied Palestinian territory and other end users who present a high risk of committing violence against civilians, both Israeli and Palestinian. The United States exported more than 15 times as many handguns to Israel in October 2023 as the previous October, according to U.S. official data. That trend continued, with November of 2023 showing exports of nearly \$8 million in handguns alone.

The United States should not supply lethal weaponry to a state that is carrying out massive collective punishment, war crimes, and possibly genocide, which has resulted in the deaths of many thousands of children and other civilians. **As humanitarian, faith, and advocacy organizations, we call on you to suspend all firearms exports to Israel and implement strong firearms export controls globally.**

Background

Small arms in Israel: More than half a million Israeli citizens live in the occupied West Bank, in cities, towns, and villages that are commonly referred to as “settlements,” which [are illegal](#) according to international law and are [opposed](#) by the U.S. government. Palestinians there are not allowed to buy or carry firearms, while Israeli citizens living there are encouraged to arm themselves. Israelis who live in occupied Palestinian territory can purchase weapons in Israel, or in gun stores in illegal settlements.¹ “98% of the guns in Israel are imported,” according to [the chairman](#) of the firearms division of the Association of Chambers of Commerce. A former State Department official stated in November that it is “almost a certainty” that American guns are being used by Israelis living in illegal settlements.

Illegal settlements also have permanent security squads, composed of civilians who receive from the military fully-automatic assault rifles. There is therefore no way to prevent weapons that enter Israel from ending up in the hands of Israelis living in illegal settlements.

The spike in U.S. exports of guns, components, and munitions to Israel is occurring at a time when the Israeli Ministry of National Security has issued 64,000 new firearms permits, more than 14,000 of which were illegal, [according to Israel’s deputy attorney](#)

[general](#). The Ministry has distributed firearms to up to 600 "security squads," overseen by both the army and police, in dozens of cities and towns, including illegal settlements in the occupied West Bank.

At the same time, armed attacks on Palestinians in the West Bank have grown. The U.N. Office for the Coordination of Humanitarian Affairs has [documented](#) and validated 272 Palestinians killed and 1,254 Palestinians injured by firearms in the West Bank since October 7.² Israeli settlers [working with soldiers](#) have burned homes, blocked roads, and shot, beaten, threatened, and body searched Palestinian residents, leading to [the flight of entire Palestinian communities](#).

Even prior to the current crisis, armament of private citizens in Israel was growing sharply, including an increase of new licenses approved for private guns from 11,000 in 2021 to 21,000 in 2022, while gun homicides in Israel increased by 73% between 2019 and 2022. More recently, gun proliferation has exacerbated violence, including [escalated neighbor disputes](#) in a Jewish town and [threats against protesters by an armed reservist](#). The government has also [proposed legalizing](#) the use of firearms with live fire against nonviolent protesters occupying any roadway.

Ministry of National Security spokespeople have said that the new regulations for guns would allow the addition of [up to 400,000 new private gun bearers](#), more than tripling the current number. The Israeli Security Ministry indicated in late November the government [was issuing](#) about 10,000 [new individual firearms](#) licenses per week. Because Israeli citizens may travel freely with weapons to and from the West Bank, the provision of such weapons to end users in Israel affects both areas.

The proliferation of weapons impacts women of all backgrounds who are disproportionately endangered by guns in homes and families, as well as people with mental health difficulties, nonviolent protesters, asylum seekers, and members of other marginalized groups.

There is also evidence that firearms and munitions, potentially including those exported by the United States, [are being used](#) in Israeli [attacks](#) in the Gaza Strip. In mid-October, the Ministry had already [ordered the purchase](#) of 8,350 rifles from the representative in Israel of the U.S.-based manufacturer Colt, and 5,200 rifles from Lavi BBG, the representative in Israel of the U.S. manufacturer Daniel Defense. While most Israeli soldiers use fully-automatic assault rifles, sniper units use semi-automatic rifles such as the American Remington M24 and Barrett REC10.

Current attacks have been described by some forty [U.N. experts](#) and [legal scholars](#) as "a genocide in the making." Previously, Israel imposed collective punishment and carried out war crimes against the civilian population in Gaza. In 2018-2019, the Israeli

military deployed snipers [armed with U.S.-made Ruger rifles](#) to suppress unarmed weekly protests by Palestinians at the Gaza-Israel border. The rifles were [used specifically to target the kneecaps](#) of Palestinians, including those of young children.

U.S. exports to Israel: Israel received more than \$75 million of likely Commerce-controlled exports in the first nine months of 2023, primarily in gun ammunition, according to [Census Bureau trade records](#). These exports represent a steep increase from \$55 million of such exports in *all of* 2022; annualized, the estimated Commerce-controlled exports from January through September were more than twice the average for 2020-2022. U.S. exports to Israel from January through September included 10,016 handguns and \$66.5 million worth of gun ammunition.

[U.S. International Trade Commission](#) data for U.S. exports in October show 5,515 handguns valued at nearly \$2.4 million shipped to Israel in that single month. This represents more than the annual average of handgun exports to Israel for the previous five years. In addition, the data shows more than 2 million bullets worth nearly \$4.4 million shipped to Israel in October.

War crimes committed by U.S.-armed troops in Gaza and by militias in the West Bank are the result of Israeli policy, not of a “few bad apples.” Israeli authorities have known in advance how many civilians – including children – were likely to be killed, injured, or forcibly displaced in each bombing attack in Gaza, because the army has files on the vast majority of residential buildings in Gaza. “We know exactly how much collateral damage there is in every home,” according to an intelligence source. In the West Bank, violence against Palestinians by Israeli forces and by settlers who act with full confidence of impunity for their actions has been persistent and systematic, and has escalated since September.

War crimes and serious violations of internationally recognized human rights by the Government of Israel against Palestinians demonstrate the government’s *intention* to commit such crimes. Intention is a key factor in implementation of the [Conventional Arms Transfer \(CAT\) policy](#).

Several factors suggest further firearms transfers to Israel would violate the CAT policy, including: the risk that the recipient may use the arms transfer to contribute to human rights violations; the probability that weapons will be used in acts of violence against children; the extent to which Israeli institutions are subject to the rule of law, with effective accountability mechanisms; the risk that the transfer will have adverse political, social, or economic effects in Israel, including by “negatively impacting the protection of human rights, fundamental freedoms, or the activity of civil society” and by contributing to impunity of security forces; the degree to which transfers may contribute to regional and local instability; the risk of diversion of firearms (including by theft); Israel’s lack of

compliance with end use requirements; and Israel's lack of membership in multilateral nonproliferation regimes. These factors dictate that conditions do not currently exist for the legal or ethical transfer of firearms from the United States to Israel.

We urge the State and Commerce Departments to:

1. Suspend all licenses and shipments of firearm exports to Israel until:

- The Israeli government gives concrete indications in its conduct and policy that it has ceased practices that constitute war crimes and that those responsible for these crimes will be held accountable in a court of law;
- Israel's attorney general recalls the gun licenses to private citizens that were issued illegally;
- Strong criteria for U.S. firearms, components and munitions exports globally, including the criteria described above, are in place; and
- The Department has the means to know and control in whose hands these lethal weapons and munitions go to in Israel and Palestine.

2. Adopt an overall policy of restraint for export of firearms, gun components, and ammunition, in recognition of their widespread use for violent crime, terrorism, domestic violence, extortion, and human rights violations around the world, and should abandon the U.S.-centric view that firearms and bullets are like other consumer goods.

3. Israel should not be singled out or held apart from other nations to which the United States exports lethal firearms.

4. Establish concrete criteria for the exclusion of end users where there is a meaningful risk that such users are involved in human rights abuses, collusion or involvement with criminal activity, domestic violence, or suppression of justice. Such criteria should be written into publicly accessible policy documents to facilitate accountability.

5. Set limits for U.S. exports of firearms, gun parts and munitions on the overall limits volume of exports to areas where the risks are significant that the transfer may exacerbate or maintain violence.

6. Consult comprehensive sources to identify problematic proposed end users as part of the review of applications for firearms exports licenses.

7. Explicitly require U.S.-based or U.S.-owned firearms manufacturers to submit license applications and end user certificates for all proposed exports, including those physically originating outside the United States, and apply equal rigor to such applications and certificates.

Sincerely,

American Baptist Churches of the USA
American Friends Service Committee
Bridge for M.O.R.E.
California Kids Pediatrics
Churches for Middle East Peace (CMEP)
CODEPINK
Congregation of Our Lady of Charity of the Good Shepherd, U.S Provinces
Dorothy Day Catholic Worker, Washington DC
Franciscan Action Network
Franciscan Peace Center, Clinton, Iowa
Global Ministries of the Christian Church (Disciples of Christ) and United Church of Christ
March for Our Lives
Maryknoll Office for Global Concerns
National Advocacy Center of the Sisters of the Good Shepherd
Nonviolence International
Nuns Against Gun Violence
Palestinian Christian Alliance for Peace
Pax Christi USA
Peace Action
Presbyterian Church (USA) Office of Public Witness
Sisters of Mercy of the Americas - Justice Team
Sojourners (sojo.net)
United Church of Christ Palestine Israel Network
U.S. Campaign for Palestinian Rights (USCPR)
Women for Weapons Trade Transparency

For a longer report on this issue, see [Memo to U.S. Commerce Department](#).

¹ See for example, a shooting range and store called Calliber 3, located in an illegal settlement in the South West Bank, which sells handguns by Colt, Glock, Sig Sauer, Smith & Wesson, and Springfield Armory, alongside some Israeli brands: <https://www.caliber3range.com/guns>

² As of January 2. In contrast, Israelis in the West Bank suffered three fatalities (two of whom were soldiers) and 26 injuries, from any type of weapon, between October 7 and December 4.