RT HON ALISTAIR CARMICHAEL MP
ORKNEY & SHETLAND

HOUSE OF COMMONS
LONDON SW1A 0AA

Rt Hon Ed Miliband MP
Secretary of State for Foreign, Commonwealth and Development Affairs
Foreign, Commonwealth and Development Office
King Charles Street,
London SW1A 2AH
fcdo.correspondence@fcdo.gov.uk

Dear Secretary of State,

We, the undersigned, welcome the package of measures you set out on 8 September, and in particular the Global Human Rights and International Humanitarian Law Sanctions Regulations 2026. For the first time, the UK has a global regime under which it can designate those involved in serious violations of international humanitarian law, or in obstructing the delivery or distribution of, or access to, humanitarian assistance.

You correctly stated that Israeli authorities had routinely blocked life-saving aid and access into Gaza, and that the new regime would allow the UK to target those responsible for violations of international humanitarian law "whether in Gaza or anywhere else in the world". The powers now exist. We urge you to use them now, beginning with those responsible for denying and obstructing life-saving aid to Palestinians in Gaza.

The Government of Israel has engaged in the arbitrary denial of food, medicine and fuel which is obstruction of humanitarian assistance and a serious violation of international humanitarian law. A return to the policy of starvation of civilians is a real fear. Both are grounds for designation. The test is whether there are reasonable grounds to suspect that a person is involved. Involvement includes being responsible for such conduct, facilitating or promoting it, profiting from it, or being responsible for investigating it and intentionally or recklessly failing to do so. In November 2024, the International Criminal Court's Pre-Trial Chamber found reasonable grounds to believe (a higher standard than the Regulations require) that the state of Israel had committed the war crime of starvation as a method of warfare in Gaza, and issued arrest warrants on that basis. In August 2025, famine was confirmed in Gaza Governorate.

The danger has not passed. In July, the IPC projected that, even with aid, around 1.4 million people, two-thirds of Gaza's population, would face crisis levels of food insecurity or worse through December. Without food assistance, the figure would rise to around 1.9 million, or 90 per cent. That assistance is shrinking. On 19 October, the World Food Programme announced that funding shortages had forced it to cut the number of people receiving support from 1.6 million to 1.1 million and to halve rations. On 16 October, UNICEF warned that the Sheikh Radwan stormwater basin could be drained within two weeks, but that the Israeli authorities had not allowed the necessary equipment in. Without this, sewage-contaminated water could flood residential areas. UNOCHA estimated that 950,000 displaced people were living in sites at medium or high risk of flooding, and that available shelter supplies could only partly assist 18 per cent of the families needing winter support. As food aid contracts, every blocked consignment matters more.

Westminster Office Tel: 020 7219 8181 Email: alistair.carmichael.mp@parliament.uk
Website: www.alistaircarmichael.co.uk FB: AlistairCarmichaeluk T: @Amcarmichaelmp
Constituency Offices:
14 Palace Road, Kirkwall, Orkney KW15 1PA Tel: 01856 876541
171 Commercial Street, Lerwick, Shetland ZE1 0HX Tel: 01595 690044

The danger is compounded by the Israeli authorities excluding the organisations that deliver aid inside Gaza. They have revoked the licences of 37 international NGOs, including Médecins Sans Frontières, Oxfam, CARE and the Norwegian Refugee Council, from 1 January 2026 for refusing to hand over personal details of their Palestinian staff; registration can also be refused on political grounds, such as alleged "delegitimisation" of Israel. The Israeli government claims that the affected groups bring in less than 1 per cent of the aid entering Gaza. But UN figures show that international NGOs run or support 60 per cent of Gaza's field hospitals and every stabilisation centre for severely malnourished children, that 132 of its 195 cooked-meal points depend on them, and that one in three health facilities would close without them. In May, Israel's High Court upheld the regime and gave the organisations until 21 June to comply or cease operations. The UK joined 20 other countries and the EU in calling that decision deeply concerning. UNRWA, the largest aid provider in Gaza, has been blocked since March 2025 from bringing its own staff and supplies into the Strip, even though the International Court of Justice advised a year ago that the state of Israel must agree to and facilitate relief by the UN and its entities, including UNRWA. Excluding the organisations that feed, treat and supply water to Gaza's civilians is obstruction of humanitarian assistance by administrative means. Designations must follow the evidence wherever it leads. That must include those Israeli officials who direct or enforce arbitrary restrictions on food, medicine, fuel, shelter and drainage equipment; groups that have blocked, attacked or looted aid convoys; those who incite or promote the denial of aid to civilians; and members of Hamas or any other armed group who divert or interfere with assistance intended for civilians. Applying the law even-handedly is what will give these designations their authority and legitimacy.

We therefore urge the Government to:

1. **Make the first designations before winter sets in.** Treat cases relating to aid obstruction in Gaza as a priority for assessment, and announce the first designations within weeks rather than months.

2. **Use the urgent procedure where allies have already acted.** The Regulations allow immediate designation of persons already sanctioned by the United States, the European Union, Australia or Canada for comparable conduct. Tzav 9, listed by the EU since July 2024 for repeatedly blocking aid trucks carrying food, water and fuel to Gaza, is an obvious case. Where an organisation is itself involved, consider designating its members by description.

3. **Secure the supplies that sanctions alone cannot deliver.** Press the Israeli government to admit food, medicines and medical equipment, fuel, durable shelter materials and drainage equipment, starting with the equipment needed at Sheikh Radwan. Obtain prompt decisions on delayed or refused consignments, including civilian equipment restricted on security grounds, with practical safeguards for any substantiated concerns. Secure sufficient crossing capacity, predictable opening hours and safe routes, and ensure UN agencies, including UNRWA, and humanitarian organisations can operate with the staff permissions they need.

4. **Fund the response.** Announce an additional UK contribution and mobilise other donors to restore food assistance and sustain water, health and winter shelter services. Sanctions, access and funding must work together if aid is to reach families.

RT HON ALISTAIR CARMICHAEL MP
ORKNEY & SHETLAND

HOUSE OF COMMONS
LONDON SW1A 0AA

5. **Designate those responsible for blocking humanitarian organisations.** Confirm that the deregistration of international NGOs and the restrictions on UNRWA and other intergovernmental organisations fall within the scope of the Regulations as obstruction of humanitarian assistance. Then designate the ministers, officials and other politicians who have designed, promoted or enforced these measures.

The measure of success will not be the number of names on a list, but whether Palestinian families in Gaza have enough to eat, safe water, and shelter that keeps out the rain. The Regulations give Britain the power; using them before winter is the test of its will. Gaza's families cannot wait for the floods to make a desperate situation worse.

Rt Hon. Alistair Carmichael MP

Rt Hon. Diane Abbott MP

Shockat Adam MP

Lord John Alderdice

Rushanara Ali MP

Tahir Ali MP

Paula Barker MP

Lorraine Beavers MP

Apsana Begum MP

Baroness Natalie Bennett of Manor Castle

Siân Berry MP

Lara Bird MP

Richard Burgon MP

Ruth Cadbury MP

Lord Michael Cashman CBE

Sarah Champion MP

Rt Revd. Dr. Guli Francis-Dehqani, Lord Bishop of Chelmsford

Bambos Charalambous MP

Dr. Ellie Chowns MP

Rt Hon. Jeremy Corbyn MP

Marsha De Cordova MP

Carla Denyer MP

Lord Alf Dubs

Neil Duncan-Jordan MP

Colum Eastwood MP

Sorcha Eastwood MP

Cat Eccles MP

Baroness Julie Elliott of Whitburn Bay

Josh Fenton-Glynn MP

Richard Foord MP

Gill Furniss MP

Andrew George MP

Rt Revd. Rachel Treweek, Lord Bishop of Gloucester

Claire Hanna MP

Westminster Office Tel: 020 7219 8181 Email: alistair.carmichael.mp@parliament.uk
Website: www.alistaircarmichael.co.uk FB: AlistairCarmichaeluk T: @Amcarmichaelmp
Constituency Offices:
14 Palace Road, Kirkwall, Orkney KW15 1PA Tel: 01856 876541
171 Commercial Street, Lerwick, Shetland ZE1 0HX Tel: 01595 690044

Lord John Hendy KC

Chris Hinchcliff MP

Baroness Sheila Hollins

Adnan Hussain MP

Imran Hussain MP

Baroness Meral Hussein-Ece

Baroness Barbara Janke

Kim Johnson MP

Ayoub Khan MP

Baroness Helena Kennedy of The Shaws LT KC

Lord John Kerr of Kinclochard GCMG

Ben Lake MP

Baroness Ruth Lister of Burtersett

Rt Hon. John McDonnell MP

Rt Hon. Lord Tom McNally

Rachael Maskell MP

Charlie Maynard MP

Abtisam Mohamed MP

Iqbal Mohamed MP

Lord Shaffaq Mohammed

Layla Moran MP

Tessa Munt MP

Rt Hon. Baroness Lindsay Northover

Lord Jonny Oates

Brendan O'Hara MP

Dr. Simon Opher MP

Kate Osamor MP

Manuela Perteghella MP

Yasmin Qureshi MP

Adrian Ramsay MP

Vikki Slade MP

Cat Smith MP

Hannah Spencer MP

Baroness Shas Sheehan

Lord Indarjit Singh of Wimbledon CBE

Alex Sobel MP

Rachel Taylor MP

Tony Vaughan MP

Rt Hon. Lord William Wallace of Saltaire

Rt Hon. Baroness Sayeeda Warsi

Nadia Whittome MP