

Affidavit

I, the undersigned, Maher Najjar, holder of I.D. No _____, having been put on notice that I must tell the truth and nothing but the truth and that if I do not do so, I will be subject to criminal penalties under the law, hereby declare as follows:

1. My name is Maher Najjar. I am the Deputy Director of the Coastal Municipalities Water Utility (CMWU). I make this affidavit to in support of a court petition regarding Israel's decision to reduce the amount of fuel and electricity supply to the Gaza Strip.
2. The Coastal Municipalities Water Utility is the Semi public utility that runs the water and sewage systems in Gaza. We rely on electricity and fuel to run the system.
3. The water and sewage system is in a very vulnerable situation. For the last 16 months (since the IDF had destroyed the transformers in Gaza Power Plant), and especially since June 2007, severe restrictions on the entry of goods into the Gaza Strip have disrupted the functioning of the water and sewage system in Gaza.
4. Because no import is permitted via sea, air, or the border with Egypt, we can only receive very limited supplies through the Gaza-Israel crossings.
5. We are experiencing severe shortages of spare parts, pumps, metal pipes, and other goods that must be obtained from outside Gaza but are delayed or are not permitted to enter at all, because of the Israeli military's restrictions on the entry of goods. We always have a fear of flood from sewage pump stations, water shortages, and other problems, because we know that we don't have the materials to respond to urgent needs. We have not been able to make necessary repairs nor any preventive maintenance.
6. Water and sewage pumps in Gaza run on electricity. When there is not enough electricity, they run on standby generators, which are powered by fuel.
7. At various times, interruptions in electricity and fuel supplies have forced us to stop operating water and sewage pumps. This is dangerous for the health and well-being of Gaza residents, Gaza's water system cannot afford further interruptions in electricity and fuel supplies.

8. We have approximately 130 water wells, thirty three sewage pump stations and three treatment plants. Ten of our wells run on fuel, and the others on electricity. We use diesel-powered generators as a back-up for our system, in case of electricity disruptions. But it's a stand-by system that cannot operate for a long time. And because we don't have spare parts for the generators, including the fuel, air and oil filters, our ability to use the generators is limited.
9. We also don't have extra fuel to run the generators in the event of electricity disruption. Fuel is expensive, and we don't have the budget to buy more of it. That would be particularly true if fuel prices were to rise as a result of shortages.
10. The Coastal Municipalities Water Utility is Gaza's biggest consumer of electricity, consuming 20-25 megawatts.
11. Gaza currently receives approximately 193 megawatts of electricity: 120 megawatts from Israel, approximately 56 megawatts from the Gaza power plant, and approximately 17 megawatts from Egypt. However, Gaza's electricity needs are 240 megawatts. So, because we are already running a deficit, we already have period interruptions in electricity supply. Further interruptions will create further stress on the generators, for which we don't have spare parts, and for which we will not have enough fuel.
12. After the June 2006 bombing of Gaza's power station, there were severe disruptions to water supplies, because we could not distribute water, and people could not pump it into their homes especially for high story buildings. The power station has still not been restored to full capacity, which partially accounts for the current deficit in electricity.
13. Reducing our electricity and fuel supplies would create the potential for catastrophic events, especially in the wastewater pump stations and treatment plants. If we can't treat the sewage, we will have to pump it directly to the sea, because we won't have enough money to purchase fuel. This will damage the aquifer and marine life, and can also spread to the Egyptian and Israeli coastline.
14. Near the winter season, sewage pumps need to operate even more (24 hours per day) because of the rain, so interruptions in fuel and electricity would be particularly detrimental.

15. The sewage treatment plant in Beit Lahiya is also vulnerable to interruptions in electricity supplies. The treatment lagoons must be pumped regularly, or else the 10,000 people living in the area are in danger. Six months ago, when one of the lagoons flooded, five people died in the floods. Proper maintenance could have stopped the disaster, but we are limited by the lack of spare parts, fighting in the area that restricts our ability to access the lagoons, budgetary problems, and general difficulties planning, in light of uncertainties about supply.
16. Some of our equipment needs to run 24 hours per day, especially pumping stations and the water wells in the highly populated Gaza City. If we don't have electricity and we can't run the generators, we will not be able to serve the entire population with water. And if people don't have electricity in their houses, they won't be able to pump the water to their roofs for use for the household. So even if I can deliver water, people will not be able to pump it to their homes without electricity.
17. I declare that this is my name, this is my signature, and the content of this affidavit, which I have signed, is true.

Signature

Date

I certify that on October 28, 2007, Maher Najjar, holder of ID # _____, appeared before me, and after I put him on notice that he must tell the truth and nothing but the truth and that if he does not do so, he will be subject to criminal penalties under the law, he affirmed the truth of this statement above and signed it in my presence.

Attorney Signature