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[emblem]
State of Israel
Ministry of Defense

Coordinator of Government
Activities in the Territories
Operations Department
Public Liaison
Tel: 03-6977957
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General – 14828
18 Tishrei 5776
20 October 2016

To:
Adv. Sacha Cherniavsky
Gisha – Legal Center for Freedom of Movement

By fax

Re: **Application for statistics on permits issued for Gaza merchants**
Application sent on August 9, 2016, ref: 10004

1. We hereby confirm receipt of your letter in reference.
2. A review we conducted following your application for information regarding permits issued to Gaza merchants in the requested periods yielded the following figures:
 - a. With respect to paragraph 5 of your application, see the following figures on BMG permits for January-August, 2016:

1) No. of BMG permits by month

Month	No. of active permits
January	349
February	351
March	350
April	349
May	410
June	105
July	185
August	193

- 2) With respect to the question posed in paragraph 5(b) of your application, we reply that no new BMG applications were filed in the period of time in question.
- 3) With respect to the question posed in paragraph 5(c) of your application, all refusals to applications to renew BMG permits were refused due to security reasons. The following is the data we have regarding the number of such refused applications, broken down by month:

Month	No. of refused applications
January	0
February	2
March	1
April	4
May	252
June	4
July	13
August	4

- 4) With respect to the question posed in paragraph 5(d) of your application, no BMG permits were revoked prior to their expiry date.
- b. With respect to paragraph 6 of your application, see the following figures on the various types of merchant permits (which are not BMG permits), as detailed in the "Status of Authorizations" document for the years 2015-2016 up to the date of the response:

- 1) No. of active permits, broken down by month and year for the requested period of time:

Year	Month	No. of valid permits per month		
		Men	Women	Total
2015	January	2814	16	2830
	February	2614	13	2627
	March	3061	15	3076
	April	3412	22	3434
	May	3613	23	3636
	June	3895	32	3927
	July	3565	34	3599
	August	3346	33	3379
	September	2911	39	2950
	October	2826	44	2870
	November	2750	51	2801
	December	2766	49	2815
2016	January	3121	60	3181
	February	3113	57	3170
	March	3116	68	3184
	April	2877	66	2943
	May	2909	73	2982
	June	2737	73	2810
	July	2583	72	2655
	August	2606	61	2667
	September	2385	53	2438

- 2) With respect to the question posed in paragraph 6(b) of our application, we reply that it is not possible to produce the information broken down by reason for refusal as the information is not recorded in the database. Therefore, such a breakdown requires examining each application individually, which means going over thousands of hard copies of applications, which could interfere with the authority's operations.

However, out of an understanding of the importance of providing the requested information, to the extent possible, we provide the figures the authority has on refused applications broken down by month below:

Year	Month	No. of refused applications
2015	February	513
	March	1305
	April	603
	May	2479
	June	744
	July	1591
	August	960
	September	504
	October	767
	November	881
	December	1190
	2016	January
February		939
March		1180
April		929
May		999
June		1407
July		1241
August		1130

- 3) With respect to the question posed in paragraph 6(c) of your application, permits were revoked prior to their expiry date for various reasons, such as: changes to the specifics of the permits (following a request by the permit holder to change specifics such as dates and hours), attempts to smuggle goods in luggage, security reasons, renewal of worn out permits, or issuance of new permits to replace lost ones.

Below are the figures on permits revoked prior to their expiry date, broken down by month:

Year	Month	No. of refused applications
2015	February	49
	March	56
	April	29
	May	47
	June	23
	July	20
	August	17

	September	18
	October	57
	November	33
	December	123
2016	January	173
	February	54
	March	40
	April	58
	May	47
	June	25
	July	61
	August	30

4) Security reasons for denying entry to a Palestinian resident of the Gaza Strip is not a technical, time-limited act. These are substantive reasons to deny entry to Israel. By their nature as substantive reasons, they are not “time limited”. So long as the basis for these reasons is established enough to justify denying an application – with attention to the nature of the application as well – the application will be denied. On this issue see also letter from Head of Palestinian Department in the International Law Department, ref: 148995-21, dated March 31, 2016.

3. For your information.

Sincerely,

[signed]
Lieut. Omri Dan
Public Liaison Officer
C O G A T