

# Open letter

July 14, 2025

To : Ms. Ekaterina Zaharieva  
Commissioner for Startups, Research and Innovation

Dear Ms. Zaharieva,

We are conveying our message to you via this open letter because unfortunately your cabinet members cancelled our meeting scheduled for 11th July, at which we had intended to appeal to your cabinet in person to **stop the European complicity in the ongoing genocide and other crimes against humanity committed by Israel**, in line with our [recent petition](#) addressed to the president of the European Commission Ursula von der Leyen, HRVP Kaja Kallas, President of the European Council Antonio Costa and yourself. As academics, we wish to address you in particular, since it also concerns your own mandate.

Over the past 21 months millions of people in Europe, including [academics](#), have been demanding action from the EU and European governments against genocide in Gaza. It took the EU more than 18 months to initiate a review of Israel's compliance with Article 2 of the EU-Israel Association Agreement (EU-IAA). On 23rd June, when the official review was presented at the Foreign Council meeting, the Council decided to wait a further three weeks.

[The promise of trickles of aid](#) being allowed into Gaza is no victory for diplomacy. This should not be used as an excuse for delaying action. **The EU should uphold the principles of international law, and hold Israel accountable.**

**We demand that the EU take meaningful action on 15th July when the Foreign Council meets again.** This is the last chance to salvage the EU's [already profoundly damaged credibility](#).

**Scholasticide and medicide are key elements of the genocide in Gaza.** The Israeli army has been targeting civil infrastructure in Gaza in violation of international law. We particularly draw your attention to the education and health care systems.

Educational institutions, from primary schools to universities, have been completely destroyed. [Up to 800,000 children and young people in Gaza have had no formal education for 2 years](#) now. The deliberate destruction of educational institutions, spaces, and history, known as '**scholasticide**', is central to Israel's broader war against the Palestinian people. Scholasticide is [designed to "obliterate the means](#) by which a group - in this instance,

Palestinians - can sustain and transmit their culture, knowledge, history, memory, identity, and values across time and space.” It [is a key feature of genocide](#).

**Medicine** is another key element of genocide. The health system is at a “[breaking point](#)” with all major hospitals destroyed and [over 1400 health care workers](#) having been **deliberately targeted** by Israel, as described [in a UN report](#). The destruction of the health care system increases mortality after injury or disease. It also erases knowledge, skills and expertise that take decades to rebuild, rendering the health care system unable to heal. This is precisely the aim of genocide: eliminating the future.

According to a recent publication, the total number of violent deaths in Gaza was estimated at [75,200 until January 2025](#), which is higher than the number recorded by the Gazan Ministry of Health (46,500 for the same period). Relatively reliable statistics of “indirect” deaths are estimated to far [exceed 100,000](#).

**Attacks on essential civilian infrastructure constitute war crimes. In Gaza these war crimes on an unimaginable scale have been committed with complete impunity.**

**The EU’s failure to act in the context of international law and the EU’s own law.** At the UN Security Council meeting on 13th May discussing the Gaza emergency Tom Fletcher, the UN Under-Secretary-General, [asked the security council members to reflect](#) on “What action we will tell future generations we each took to stop the 21st century atrocity to which we bear daily witness in Gaza”. We ask you the same question.

The role the EU plays is not a minor one. As [Israel's largest trade partner](#), contributing 32% of its total trade, the EU has strong leverage, which it has not exerted to date. The following legal framework indicates that the EU, including your office, has a very clear obligation:

- [The ruling of The International Court of Justice \(ICJ\) on 26 January 2024](#): Israel is likely to be in breach of [the 1948 Genocide Convention](#). The court ordered Israel to prevent the genocide and allow unhindered humanitarian aid.

- [The advisory opinion of the ICJ on 19 July 2024](#): Israel’s policy and practices in the Occupied Palestinian Territory are in breach of the **right to self-determination** and **prohibition of the acquisition of territory by force**, as enshrined in the UN charter. The court ordered Israel to end occupation, colonization and apartheid.

- [The UN General assembly resolution](#) on 18 September 2024: this supports the above advisory opinion. September 2025 was the date set for Israel to end the occupation, colonization and apartheid.

- The [arrest warrants](#) from the International Criminal Court (ICC) for the Israeli prime minister Benjamin Netanyahu and the former defence minister Yoab Gallant for war crimes and crimes against humanity.

This legal framework gives all states and organizations, including the EU, *erga omnes* obligation to **recognize, prevent and punish the crime of genocide; and not to recognize as legal**, and **not to render assistance to the maintenance** of, all illegal situations created by Israel. Failing to do so entails liability.

We remind you that the deadline to dismantle the occupation and the associated regime is 13th September 2025. We ask: **what actions have you taken to end genocide, occupation and apartheid?**

This inaction shows **a glaring double standard** compared to the swift actions which the EU took against Russia. [The EU imposed an arms embargo on Russia](#) within a week (31st July 2014) after the annexation of Crimea. Payments to Russia under the contract of EU research funding Horizon 2020 [were suspended within a week](#) after the invasion of Ukraine, and [all grant agreements were terminated](#) on 8th April, 2022.

#### **Specific responsibilities of the Commissioner for Startups, Research and Innovation.**

In the case of EU research funding the legal liability might go further, as there is [a well-founded concern](#) that the near two decades of research funding to Israel has been used to develop military and security technologies that were deployed in numerous Gaza wars and now in genocide.

Some projects involving participation of Israeli entities involved cutting-edge military/security technologies. These technologies play a central role in the repression, mass surveillance and control of the Palestinian population and enable the maintenance of the occupation, colonization and apartheid. Here again, this funding renders the Commission, particularly your office, liable for actively assisting these situations deemed illegal in the ICJ Advisory opinion.

Furthermore. the EU's own law and regulations on ethics concern your office:

- Article 19 of the [Horizon Europe regulation](#): "Actions carried out under the Programme shall comply with ethical principles and relevant Union, national and international law". Non-fulfillment should result in rejection or termination.

- Article 14 of [the model grant agreement](#): "The beneficiaries must commit to and ensure the respect of basic EU values (such as respect for human dignity, freedom, democracy, equality, the rule of law and human rights, including the rights of minorities)".

The beneficiaries of EU funding include the Israeli Ministry of Defence and numerous weapons manufacturers, even after 7th October 2023. For example, the Ministry of Defence is a partner, together with the "combat-proven" (= "[tested on Palestinians](#)") Israeli

weapons manufacturer [Rafael](#), in the currently running (until 30/09/2026) project [UnderSec](#), which addresses the topic of underwater security. This is stunning when considering the systematic illegal attacks by the Israeli army taking place at sea, whether of [Palestinian fishermen](#) or even [activists](#). How does the Israeli Ministry of Defence fulfill the requirement of Article 14 of the model grant agreement ? It has - among many crimes - [deliberately attacked hospitals, arrested and tortured doctors and medics](#), killed them and [buried them in a mass grave](#). Its former head, who is subject to an arrest warrant for crimes against humanity, was in office during the first year of the project; and its current head is calling for a [concentration camp](#) in Gaza.

These are serious questions that lead us to our further analysis of some of the projects involving Israel, as follows:

**Horizon Europe and Ethical oversight:** On 10 February 2025, answering Parliamentary question E-001930/2024(ASW), you stated the “**exclusive focus on civil applications**” of activities carried out under Horizon Europe and mentioned “**several mechanisms**” for monitoring “the use of EU funds and compliance with the contractual obligations”, with concrete consequences if violations are observed. By this careful choice of words, you tried to absolve yourself of any responsibility beyond the project term. It is then apparently easy for participants to use Horizon projects as a testbed for intended military applications after the project is formally finished. However, in that case, EU procedures imply that participants should signal the “dual-use” character of their project, and address it in detail following certain additional requirements.

Nonetheless, the (obvious) dual-use character is often ignored or hidden by participants in their self-assessment, and missed (ignored?) by EU ethics checks. One blatant example of such a dual use project is the Horizon [HERWINGT](#) project, as one example among many. HERWINGT (running until October 2026) involves, next to Israel Aerospace Industries (IAI), two industrial participants which both clearly [state](#) military applications. One names “**Dual Use Multimissions Aircrafts** through **new versions of C295**” ([C295 being a military aircraft](#)); the other mentions, “not only [...] Hybrid Electrical Regional Aircrafts, but also [...] **any other category of airframes**, within civil aviation, and **also it will be valid for military ones**”. The dual use character that was obvious from the project description is thereby openly endorsed in a document *nota bene* already publicly available on the EU website before your statement (we analyzed it on 30 December 2024).

Then, on 4 March 2025, answering Parliamentary question E-002908/2024, you added: “**The projects in which Israel Aerospace Industries participates are of a purely civil nature**. These include, *inter alia*, projects to develop **hybrid electric regional aircrafts** [...]”. We assume that these projects were carefully checked before you made that

statement. Unfortunately, your description perfectly fits HERWINGT, which involves IAI and [“a new wing design for a hybrid electric regional aircraft”](#). Obviously, this project is not “of a purely civil nature”, as demonstrated above. We must conclude that HERWINGT was missed or ignored in EU checks, not only once but at least twice, as having obvious military applications.

We have the exact same situation for [ROXANNE](#), which involves speech and language technologies, face recognition and natural language processing (a subfield of AI), where any dual use question is ignored while military applications are clearly stated in another public document, by mentioning [Fortion Massive Intelligence](#) as a platform benefiting from the project outcomes.

A third example is the project Multispin.AI ([HORIZON-EIC-2023-PATHFINDEROPEN-01-01 - EIC Pathfinder Open](#)). This research has obvious mass surveillance and warfare applications. Questions arose regarding [the military finality](#) of some of the research because of the participation of Bar-Ilan University, which has a strong [military research](#) profile and of the Israeli startup SpinEdge, which is a graduate of the [INNOFENSE](#) Innovation Center operated in collaboration with the Israeli [Ministry of Defence](#). Furthermore, this project involved a principal investigator from UCLouvain who was also part of the [SPINAR](#) project, which explicitly included military research, among other military projects. UCLouvain eventually decided to step out of another project, [MOSAIC](#), again involving Bar-Ilan University and SpinEdge. These elements strongly suggest that the military intent for the Multispin.AI research reaches beyond the Israeli partners and that this intent persisted after the extent of the war crimes and crimes against humanity in Gaza was clearly established.

We analyzed heavily redacted documents obtained via the Freedom of Information Act. In HERWINGT’s Evaluation Summary Report, we found ONE question about “exclusive focus on civil applications”, where the participants answered: “yes”. In the Ethics Summary Report, there is no mention at all of dual use. Regarding the disturbing fact that the top supplier of the Israel army, IAI, is involved on this topic of improving performance of aircraft, “non-EU countries and AI [...] have been flagged as an Ethics issue. In the first case, sufficient arguments are delivered by the applicants for this issue to be considered as clear”. However, such arguments were not visible in the ~60 black pages which the EU sent us.

Interestingly, the EU checks suddenly identified the dual use issue for ROXANNE, very late in the process (3<sup>rd</sup> ethics check only, 18 months into the project), but without any consequence. Although “requirement remains open”, indicating that the necessary information was not disclosed, the ethics check report answers “no” to the question “do

you recommend further ethics check?” ROXANNE involves as an Israeli partner no less than the Israeli Ministry of Public Security, deeply involved in discrimination against and oppression of Palestinians.

For Multispin.AI, the EU Commission reported that the project did not raise [any substantial ethical issue](#). Communications with the commission through a Freedom of Information request (see [full documentation](#)) established that there was no disclosure of the military intent of SpinEdge/Bar-Ilan. Furthermore, the Commission asserted explicitly that there was [no expectation of such disclosure](#).

Ethical review requires that all relevant elements are shared with the ethical reviewers. Not only this does not seem to be the case in any of the three projects analyzed above, but the Commission has set up an ethical review process that is **knowingly blind to dual-use and misuse risks**, which turns the review process into a form of ethics-washing. Some ethics issues are not identified at all: for instance the human rights conduct of the country and the beneficiaries. On clearly identified issues, ethics checks rely on self-assessment. The Commission is therefore not in control of “verifying in particular the use of EU funds and compliance with the contractual obligations”.

According to the Commission’s [Briefing for independent external experts for Ethics Appraisal](#), AI ethics review (this applies to all three projects) requires consideration of “significant negative social impacts” - “either through intended applications or plausible alternative uses”, which is impossible in the absence of the relevant disclosures.

Furthermore, the ethics self-assessment contains an item (Item 7) explicitly stating that “activities intended to be used in military application or aiming to serve military purposes cannot be funded”. This makes it clear that the “**intent**” behind the research is an essential element of the evaluation. Clearly in all three projects, the intent is at least partly military. Under the Commission’s own guidelines, it is not acceptable only to consider the research activities as narrowly described in the research proposal in order to assess whether the research has an exclusively civilian focus.

We do suspect, however, that the officials handling the request for these documents know there is an issue, because efforts had clearly been made to conceal information in most of the documents we obtained. In particular, for ROXANNE, the text concerning “dual use” in the 3<sup>rd</sup> report was made unreadable to us. Furthermore, the EU’s [briefing](#) asserted that in 2024 the evaluation of the “exclusive focus on civil applications” and of the “dual use” risks would not be part of the ethics appraisal any more, but should be “verified by scientific evaluators”. This is likely to cause major confusion, as most scientific evaluators are ill-equipped to anticipate relevant ethical issues. Given the commission’s clear intent to open

the doors to dual-use research (see Recommendation 12 “[Embrace dual use as inevitable by exploiting dual use both ways](#)” of the Commission Expert Group Report on the Interim Evaluation of Horizon Europe), one is left to wonder whether the undermining of the ethics review process is purposeful.

### **Conclusions:**

It is a fact that EU Research funding is being used for Israel’s criminal activities, as was recently published in [Dutch](#) and [French](#) media. The Israeli company Xtend Defense received Horizon funding for the development of drones that were recently used in Gaza. This issue probably involves many more EU projects. In the case of the Netherlands alone, it was [recently estimated](#) that Dutch universities are currently involved in no fewer than 28 dual-use projects in collaboration with Israeli partners. Extrapolating this to all EU countries and the almost 20 years during which Israeli organizations have been receiving EU research funding (above 3 billion euros), in the context of the Israeli atrocities and the international legal obligations described above, this lack of oversight is massively criminal. It is unacceptable that European taxpayers’ money has been used to assist genocide and other crimes by Israel. Therefore, we demand the **immediate suspension of Israel from Horizon** and an **independent investigation** into the past and future human rights impact of EU research funding, due to the immense risks involved as detailed above.

As the [recent report](#) of the UN Special Rapporteur Francesca Albanese reminds us, it is a crime to knowingly contribute to the crimes against humanity such as apartheid and genocide. As violation of these *jus cogens* norms are not subject to a statute of limitations, organizations and individuals therein who have not taken action to prevent such crimes are liable for their entire lifetime.

We also appeal to you to **take a lead in supporting the reconstruction of the destroyed education and health systems of Palestine, including urgent concrete assistance for the continued education and training of Palestinian students and academics** as your predecessor promised us.

Yours sincerely,

Prof. Yves Moreau and Dr. Nozomi Takahashi, Advisory board member and chair of Belgian Academics and Artists for Palestine (BA4P)

Prof. Em. Ivar Ekeland, Vice chair of French Association of Academics for Respect for International Law in Palestine (AURDIP)

Prof. Em. Jonathan Rosenhead, Vice chair of British Committee for the Universities of Palestine (BRICUP)

Dr. Sue Blackwell, Dr. Genevieve Girard & Prof. Francesco Battaglia, on behalf of Dutch Scholars for Palestine (DSP)

Dr. María José Lera, on behalf of Red Universitaria por Palestina (RUxP)-University Network for Palestine, Spain

Dr. Harry Browne & Dr. John Reynolds, on behalf of Academics for Palestine, Ireland

Prof. Em. Guido Vanham, Prof. Geertrui Van Overwalle and Prof. Thomas Van Riet, on behalf of Palestine Interuniversity Network (PIN), Belgium

All representing European Coordination of Committees and Associations for Palestine (ECCP)