



Report of the State Comptroller of Israel | May 2024

The Ministry of Agriculture and Rural  
Development

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# **The Central Unit for Enforcement and Investigations in the Ministry of Agriculture**





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## Background

The Ministry of Agriculture and Rural Development (Ministry of Agriculture) is responsible for the development and flourishing of agriculture in Israel, for ensuring a continuous supply of fresh, high-quality, healthy, and safe food for the public, for the protection of animals and improving their well-being, and for the protection and preservation of agricultural and natural flora against pests and diseases. The Central Unit for Enforcement and Investigations in the Ministry of Agriculture (the 'Pizuach' Unit) is responsible for supervision and enforcement in agriculture in Israel, in the transit of agricultural produce through the Seam Zone area and the crossings between the territories of the Palestinian Authority (PA)<sup>1</sup> and Israel. Therefore, the unit plays a key role in maintaining public health, animal health and welfare, and the agricultural sector in Israel. The Pizuach Unit employs 78 employees<sup>2</sup> and is directly subordinate to the Ministry of Agriculture's Director General.

This report relates to the period preceding the "Swords of Iron" war that broke out on October 7, 2023. As of that date, the border crossing for agricultural produce from Gaza to Israel and Judea and Samaria was closed, and as of the date of signing of this audit report, February 15, 2024, it is still closed. Therefore, some of the recommendations in this report will require adjustments after the war's end.

1 For the purpose of this report, the PA includes the Judea and Samaria area, together with Gaza.

2 Including nine students and National Service volunteers.



## Key Figures

**about  
2,250  
thousand tons**

the estimated volume of the average vegetable agricultural produce consumed annually in Israel

**1.5%**

the vegetable agricultural produce rate imported from the PA to Israel, out of the total produce consumed in Israel (about 33 thousand tons out of 2,250 thousand tons on average per year)

**only  
21%**

the cases rate that led to the opening of an investigation, out of the total cases opened in the Pizuach system in 2018–2022 (4,097 out of 19,703)

**only about  
NIS 23  
million**

the total administrative fines imposed by the Ministry of Agriculture in 2018–2022 in the Pizuach Unit's enforcement areas

**89%**

of all the Pizuach Unit's inspectors conducted investigations or detained suspects without the appropriate authority to do so (54 out of 61)

**31%**

of the disciplinary complaints in the Civil Service Commission on the Pizuach Unit's employees were found justified and ended in conviction or disciplinary punishment

**5**

crossings through which a commercial quantity of plant produce of Palestinian origin can be transported into Israel's territory

**40%**

the sample rate in which deviations in levels of pesticide residues were detected in 2022, out of all samples taken from Palestinian plant produce

**93%**

of all the poultry, chicks, and incubation eggs shipments that arrived at the crossings to the PA in 2022 were not recorded in the Pizuach Unit's computerized system

**57%**

of all of the meat imported for the PA through Israel's ports is suspected to have remained in Israel in 2018–2021 (there is a record of only 36,501 out of 84,534 tons arriving at the crossings)

**an 85%  
decrease**


the decrease rate in the scope of the intelligence reports received by the Pizuach intelligence array in 2022 compared to 2016

**only 21%  
of the  
intelligence  
reports**

received by the Pizuach Unit's intelligence array from the beginning of 2022 to the middle of 2023 were handled (37 out of 179)





## Audit Actions

 From February to September 2023, the State Comptroller's Office examined the Pizuach Unit, including discipline, compliance, and professional performance of employees; The certification and appointments of employees for carrying out enforcement; The control of the passage of goods between Israel and the PA; And the prevention of smuggling and laundering<sup>3</sup> of goods from the PA to Israel. The audit was carried out at the Ministry of Agriculture. Completion examinations were carried out at the Ministry of Health, the Ministry of Defense, the Civil Service Commission, the Ministry of National Security, the Egg and Poultry Board (the Poultry Board), the Israel Tax Authority (the Tax Authority), the Israel Border Police and the Israel Police.


## Key Findings



### The Professional Performance of the Pizuach Unit

-  **The Pizuach Unit Inspectors Compliance with Professional Goals** – in 2020–2022, an average of 92% of the Pizuach Unit inspectors failed to meet the professional goals necessary to fulfill their duties. Several officials in the Unit and the Ministry of Agriculture are aware of the significant professional gaps concerning the professional ability of the inspectors. These gaps directly affect the inspectors' ability to perform core tasks in an investigation, gather evidence and summarize investigation reports.
-  **Closing of Cases by the Pizuach Unit** – in 2018–2022, the Unit independently closed 218 (6%) out of 3,940 cases in which an investigation was launched in the Pizuach system and whose processing was completed without transferring them to the examination of the prosecuting authorities at the Ministry of Agriculture. Although the authority to examine whether the evidence is sufficient for prosecution or to close an investigation case rests exclusively with the prosecution authorities.

### The Control Over the Passage of Goods Between Israel and the PA

-  **Pesticide Residues in Plant Produce from the PA to Israel** – in 2015–2022, the sample rate taken from Palestinian plant produce upon entry into Israel with excessive

<sup>3</sup> The transfer of produce purporting to be Israeli produce.



levels of pesticide residues was 27%– 40%, and there has been a steady increase in it since 2018. This rate was 2.5-fold higher than in 2019, 2.9-fold in 2020, and 5.3-fold in 2021 than the rate of samples with excessive levels found in the Plant Protection Services Unit survey and the control of plant products originating in Israel.

**📌 Placing Agricultural Produce from the PA Territory into Suspension**

**Warehouses** – the samples taken at the crossings from Judea and Samaria are transferred for laboratory testing, and their results are received within a few days. However, the produce is distributed from the crossings to the marketers immediately, even before the test results are obtained. Hence, thousands of tons of goods in which deviations are detected in the samples have already been distributed to the markets, and it is impossible to locate the goods in which deviations were found and to prohibit their marketing to protect public health.

**📌 Supervision of the Transfer of Cattle and Sheep from Israel to the PA**

– due to the conditions in the transit of goods between Israel and the PA, the Pizuach inspectors approve the transfer of cattle and sheep from Israel to the PA without sufficient verification of the data indicated in the transfer permit<sup>4</sup>, compared to the actual situation. Hence, there is no real control over the number of animals transferred to the PA and the cattle's identity. This impairs the ability of the Veterinary Services in the Ministry of Agriculture to control the herds of sheep and cattle in Israel's farms and to prevent diseases, providing a loophole for Illegal Slaughter<sup>5</sup> (to the extent that the number of animals transferred is lower than the number specified in the permit), and for tax evasion and payment of transfer fees lower than required (to the extent that the number of animals transferred is greater than the number specified in the permit).

**📌 Supervised Transfer of Poultry, Chicks, and Incubation Eggs from Israel to the**

**PA** – shipping certificates for the transfer of poultry, chicks, and incubating eggs (poultry products) from Israel to the PA are issued in the computerized system of the Poultry Board. In the absence of a connection between the 'Shaar Ephraim' and 'Kerem Shalom' crossings to the Poultry Board's computerized system, the Pizuach inspectors cannot confirm by the system the arrival of the poultry products at the crossings. It was raised that in the first half of 2023, the transfer of 97% of the shipments of poultry, chicks, and incubating eggs to the territories of the PA were not recorded by the Pizuach Unit in the Poultry Board's system. It was also found that the Pizuach Unit and the Poultry Board do not follow up on or inquire about poultry products that did not reach their destination Crossings. This affects the supervision and the prevention of Illegal slaughter, black economy, and cruelty to animals. Furthermore, the Poultry Board cannot verify the data it relies on to plan the entire poultry industry in Israel.

4 A permit issued by the Veterinary Services as a condition for the transfer of animals.

5 Pirate slaughter is the slaughter of animals outside of a slaughterhouse.



- Import of Meat from Abroad for the PA, Remaining in Israel** – in 2018–2021, according to the data in the Pizuach system, the arrival of only about 37 thousand tons of meat out of about 85 thousand tons of meat for the PA was recorded at the crossings. Hence, there is suspicion that about 57% of the imported meat for the PA remains in Israel. This situation is due to the fact that there is no mechanism by which Customs authorities updates the Pizuach Unit when a shipment of meat leaves for the crossings. Therefore, the Pizuach Unit cannot identify trucks that were expected to arrive at the crossings but did not actually arrive there, and it cannot even check the reasons for this. This state of affairs means that the meat spillover into the black economy, which may also harm the public's health due to the lack of supervision over it throughout the supply chain, lead to misleading the public regarding its kosher status and result in an excess transfer of VAT funds to the PA for goods in the estimated volume of thousands of tons of meat, which did not reach its destination.
- The Computerized Interface Between the Pizuach Systems and the Crossing Points Authority (CPA)** – CPA operates four crossings<sup>6</sup>, enabling the transfer of goods and managing its work using a computerized system known as 'Zramim.' Although the system was activated about four years before the audit end date, the Pizuach Unit and its work are almost not incorporated in it, and Pizuach's approval does not serve as a precondition for transferring the goods through the crossing. Furthermore, following the departure of the trucks from where the goods are loaded onto the destination truck, there is no physical infrastructure (such as an additional gate) at any crossing that allows the truck to be delayed and inspected by the Pizuach inspectors. Hence, a truck can enter Israel without undergoing an inspection to verify that the declared produce corresponds to the actual produce found in it and that the volume of goods brought in corresponds with the permitted quota (for example, from April 2022 until the end of 2022, 1,048 tons of produce were transferred in 290 transfers of produce at the crossings, even though the grower did not have an active quota), and that the produce is sampled for pesticide residues and microbiological contamination, as required. Furthermore, the Pizuach Unit is not exposed to the information stored in the Zramim system that could have been used for risk management, investigations, and intelligence activities.
- The Control of the Crossings of Goods Between Israel and the PA** – inadequate physical infrastructure at the crossings, the lack of information sharing, and the lack of synchronization of the information systems between the bodies at the crossings result in a loophole for the uncontrolled transfer of goods between Israel and the PA. This results in the unauthorized entry of goods to Israel in an amount that cannot be precisely quantified and is estimated at a minimum of thousands of tons per year. Naturally, this unauthorized entry leads to the spillover of goods to the black market in Israel, to animal

6 Kerem Shalom, Tarqumiya, Sha'ar Efrayim, and Gilboa



cruelty, and harm to public health due to the entry of goods that do not meet health standards.

**📌 The Pizuach Unit's Activity at Crossings from Judea and Samaria that are not Goods Border Crossings** – the Pizuach Unit rarely mans the vehicle crossings or conducts inspections therein (except at the A'Zaim crossing). For many years, there has been a wide-ranging phenomenon, known to the Ministry of Agriculture and the Civil Administration, of the illegal entry of large amounts of agricultural produce from Judea and Samaria into Israel through smuggling and goods laundering (transferring the produce as if it were Israeli produce). This produce includes, among other things, meat at volumes that cannot be quantified, eggs estimated in 2020 at about 60–80 million eggs per year, plant produce originating from Judea and Samaria in an estimated volume of 30,000 tons per year, as well as plant produce originating from Gaza for Judea and Samaria but arriving in Israel through Judea and Samaria without a permit on a large scale, the scope of which was not detailed. In practice, the Pizuach Unit settles for the inspections carried out by the authorities that operate the crossings, who call it in when necessary. From the examination of the 122 incidents that occurred at the vehicle crossings examined, except for the A'Zaim crossing, it was raised that about 67% of them were the result of a call to the Pizuach Unit by other units, and they are not the result of proactive inspection by the Pizuach Unit. This may pose a real risk to public health in Israel. In addition, the goods may spill over into the black economy, and if it is meat, even mislead the public regarding its kosher status.

## The Pizuach Unit's Intelligence Array

**📌 The Closing of the Pizuach Unit's Intelligence Array** – for over three years (2018 – the beginning of 2021), the Pizuach Unit operated without an intelligence array after it was shut down due to illicit retrievals of information from databases by the Unit. From March 2021 until the audit end date, a skeletal intelligence array was established, including an intelligence center, a desk officer, and two national service volunteers operating only from the Unit's headquarters. As a result, there is no response to the intelligence needs of the Unit's management and districts in enforcement and crime prevention, and the Unit conducts itself without direction and a focus on its operations. It was further raised that although the Pizuach Unit is required to contend with the smuggling hubs in the Seam Zone and the Barta'a local authority, as well as with pirate slaughter in the Bedouin communities, the intelligence unit employees speak no Arabic at all, except for the array's coordinator, who has a basic command of spoken Arabic.

**📌 Access to Databases** – the audit found that since the closing of the Unit's intelligence array in 2017 and until the audit end date, the Unit did not have access to information systems that are necessary for its work – at the Population Authority – the Border Control Administration's "Rotem" system, and the Ministry of Transport's system regarding vehicle ownership, which the Unit only had access to in 2021–2022, until the death of





the Unit's director, which has not been renewed since<sup>7</sup>. Blocking access to the information systems above prevents the Pizuach inspectors from locating information about vehicle owners registered in the Ministry of Transport's vehicle database, preventing the departure from the country of suspects needed for investigation through the "Rotem" system of the Border Control Administration at the Population Authority, or delaying the entry into the country of suspects attempting to smuggle plants and animals whose entry is prohibited.

**📌 The Handling of Intelligence Reports** – the flow of intelligence information to the Pizuach Unit was halted in the years when the array was not active, and after its activation in a skeletal manner, the scope of intelligence reports received was much lower than in previous years (a decrease of 85% from 2016 to 2022).

**📌 The Work and Operation Plan of the Intelligence Array** – the intelligence array does not have an orderly document determining its priorities (subjects of interest), there is no orderly work plan that is adapted to the scope of the existing workforce in the array, and it does not map "problem centers" – according to the place, time, type of activity or scope – for prioritizing and focusing the districts' activity, and building a systematic intelligence picture that will help direct the activity of the Unit's districts.

## The Certifications and Appointments of the Pizuach Unit Employees

**📌 The Certifications and Appointments of the Pizuach Unit Employees** – the Pizuach Unit is responsible for enforcing 12 laws subject to the authority of the Ministry of Agriculture, sections of the Public Health (Food) Law, 2015, subject to the authority of the Ministry of Health, and sections of the Penal Law, 1977. To enforce the laws, the Pizuach Unit inspectors execute powers of detention, investigation, or both, as well as additional powers such as entry, search, and seizure under the provisions of the authorizing law. As of the audit date, the Pizuach Unit employs four inspectors and directors whom the Police refused to authorize to investigate and detain suspects: the Pizuach Unit Deputy Director who, from November 2022 to August 2023, served as the Pizuach Unit's acting director without an official appointment on behalf of the Ministry of Agriculture; The Director of the North District, who stated in the appeal he submitted to the Police, which was denied, that the denial of the certification constitutes serious harm to his position; As well as two inspectors who, despite the Police's refusal to certify them, were assigned almost every week to work on Saturdays, when the Unit carried out enforcement actions only, which requires the execution of investigation and detention powers. It was also raised that all of the inspectors and directors of the Pizuach Unit are

<sup>7</sup> Access to the system is personal, therefore with the death of the Unit's director, the access that was in his name was blocked.



not authorized or appointed to fully enforce the laws the Unit is responsible for enforcing or are not authorized by the Police to be inspectors.

**📌 Executing Powers of Investigation and Detention Without Being Authorized –** 89% of the Pizuach Unit inspectors and directors (54 out of 61 employees) conducted investigations or detained suspects without being authorized with the full powers required to do so. For example, the inspectors conducted investigations regarding violations of the Animal Cruelty Law (Protection of Animals), 1994, without the approval of the Police of their appointments according to the law, as well as investigations regarding violations of the Order on the Transfer of Goods (No. 1252), 1988, concerning the transfer of goods to Israel from the territories of the Palestinian Authority, without being authorized to do so.

**📌 A Computerized Interface Between the Civil Service Commission and the Police –** in the absence of a computerized interface, the Police's Certification Department turns to the Civil Service Commission for information about a candidate for certification only when there is an indication that a disciplinary proceeding was conducted against the candidate at the Civil Service Commission. Given this policy, the Certification Department did not contact the Disciplinary Division at the Civil Service Commission to obtain information on 19 out of 20 inspectors approved by it in 2018–2022, about whom the Disciplinary Division handled complaints.

**📌 License to Carry Weapons –** 17% of the Pizuach Unit inspectors and directors (10 out of 60 employees)<sup>8</sup> do not have a license to carry weapons as required, despite the enforcement nature of their duties and the fact that they are required to carry weapons in their activities along the Seam Zone and in the goods border crossings. It was also found that three of them do not hold a license to carry weapons because their license has been revoked. Furthermore, nine of the ten inspectors and directors who do not have a license to carry weapons were assigned to work in the Seam Zone despite the requirement to carry weapons while operating in this area, and some of them even stated that they worked at least six hours a day in Judea and Samaria.

## Discipline and Compliance in the Pizuach Unit

**📌 Discipline Issues in the Pizuach Unit over the Years –** from the beginning of 2001 until the middle of 2023, 54 complaints were submitted to the Civil Service Commission, about 38% of the Pizuach Unit's employees at the time of the audit (26 out of 69 employees)<sup>9</sup>, and 39% of the complaints were about employees with a managerial

<sup>8</sup> One of the inspectors went on unpaid leave, so he returned his weapon and was not included in the examination

<sup>9</sup> Some of the complaints were handled by the Ministry of Agriculture and brought to the attention of the Disciplinary Division at the Civil Service Commission. Not including students and national service members in the Unit.

position in the Unit (21 out of 54 complaints)<sup>10</sup>, even though they are only about 9% of all the Unit's employees. 31% of the complaints whose processing was completed (16 out of 51)<sup>11</sup> were justified and ended in a conviction in the disciplinary court or an intra-ministerial procedure of a reprimand, warning, or note.

**📌 Compliance of the Pizuach Unit Inspectors with the Conflict-of-Interest Arrangements Drawn up for Them** – according to the Pizuach system data, 4 of the 32 employees who signed conflict-of-interest arrangements (12.5%) did not comply with them. Moreover, an inspector in respect of whom a decision was made that he refrains from engaging in any supervision or enforcement activity in cattle carried out about 70 operations in this field, including audits of butcheries, investigations into offenses related to cattle, and seizures of cattle.

**📌 The Ministry of Agriculture's Handling of the Disciplinary Issues in the Pizuach Unit** – despite the June 2021 warning issued by the Director of the Disciplinary Division at the Civil Service Commission to the senior officials at the Ministry of Agriculture, and despite warnings and reports of the Ministry of Agriculture's internal auditor in 2015–2018 regarding the conduct of the Pizuach Unit and the recurring disciplinary incidents in the Unit, as well as the conclusions of an internal inspection team at the Ministry of Agriculture regarding repeated disciplinary offenses in the Pizuach Unit, the Ministry of Agriculture did not consider measures to prevent repeated disciplinary incidents in the Pizuach Unit and their detection, and in particular the incidents allegedly committed by directors in the Unit. Moreover, even after the convictions of several employees in the disciplinary court, the Ministry of Agriculture did not deliberate on the employees' suitability for their duties<sup>12</sup>. The ongoing reality and the failure to address the situation have severe practical ramifications: for example, since the closing of the intelligence array at the end of 2017, following the discovery of the illicit retrieval of information carried out by Pizuach Unit employees, the Ministry of Agriculture is fearful of returning and entrusting powers to the Unit's intelligence array, to enable its return to full activity, including the provision of access to information systems. The Unit's conduct over the years and the many disciplinary proceedings conducted regarding its employees may adversely affect and undermine the public's trust in the enforcement agencies in general.








10 Including the Unit Deputy Director; The Unit's Intelligence Coordinator; And directors of two districts.

11 At the time of the audit, three complaints were still being processed by the Civil Service Commission.

12 In this regard, see Section 46A of the Civil Service (Appointments) Law, 1959.







## Key Recommendations

-  The Minister and the Director General of the Ministry of Agriculture should fundamentally change the Pizuach management and adherence to its work procedures. Thus, the unit will be able to fulfill its functions in the best possible way, primarily safeguarding public health and the health and well-being of animals, and protecting the flora.
-  The Pizuach Unit and the Ministry of Agriculture's management should analyze the reasons for the Unit's weak performance and improve it.
-  The Ministry of Agriculture should ensure that only the prosecution bodies, and not the Pizuach Unit inspectors, will decide whether there are grounds to close cases in which an investigation was conducted under the provisions of the law and the instructions of the Ministry's legal bureau.
-  The Ministry of Health, the Ministry of Agriculture, the Coordinator of Government Activities in the Territories, and the Civil Administration, in coordination with Crossing Points Authority, should examine the existing mechanism for transferring plant produce from the PA to Israel and inspect its nature. They should also implement methods to reduce the extent of the deviations of pesticide residue levels discovered in produce transported from the PA to Israel.
-  The Pizuach Unit and the Veterinary Services should decide upon the appropriate solution to improve the monitoring of the arrival of shipments of sheep and cattle from Israel to the border crossings. It is further recommended that the Pizuach Unit, the Veterinary Services, and Customs establish an orderly outline for their cooperation to ensure that all the meat imported for the PA through the ports of Israel reaches its destination. This is to protect the public's health, prevent Illegal slaughter, ensure the payment of taxes and fees legally, prevent the suffering of animals from overcrowding during transport, and prevent the deception of the kosher-observant public. It is recommended that the Pizuach Unit and the Crossing Points Authority examine all of the abilities inherent in the Zramim system to advance the Pizuach Unit's intelligence, enforcement, and operational goals and, according to the findings, connect the Pizuach Unit to the Zramim system or relevant parts thereof.
-  It is recommended that the entry of trucks transporting agricultural produce through the goods border crossings will also be stipulated upon obtaining approval from the Pizuach Unit while creating a mechanism to ensure that the work routine at the crossings will not be affected. Furthermore, it is recommended that an adequate solution be found to ensure that the required inspection is carried out even before the release of the truck from these crossings.
-  Given the estimates regarding the extensive scope of goods smuggling and laundering through the vehicle crossings from the PA to Israel, it is recommended that the Pizuach

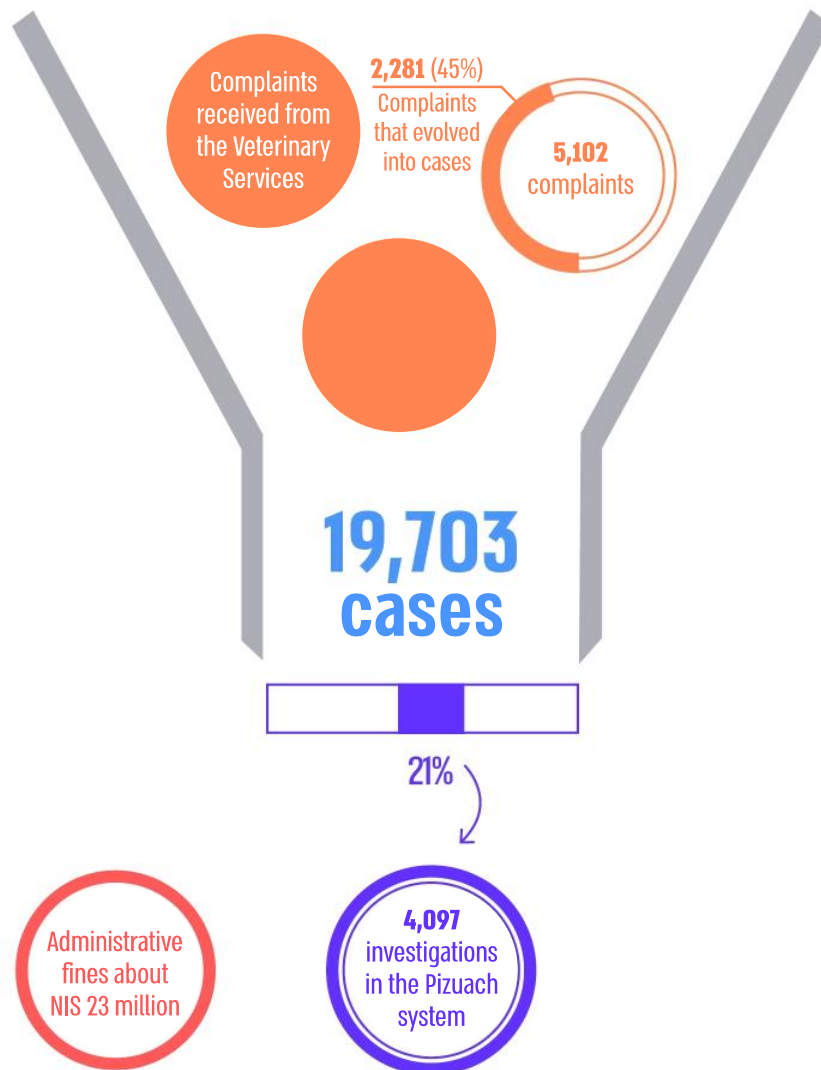


Unit increase its proactive presence at these crossings, according to periodic intelligence assessments.

-  The Ministry of Agriculture should develop an intelligence array to support the fulfillment of the Pizuach Unit's objectives, coordinate and optimize the enforcement activity in its districts, set a work force headcount standard for it and staff it, set a work plan for it, and ensure its regular operation and the provision of the necessary tools for the performance of its duties.
-  The Ministry of Agriculture should discuss the repeated incidents of disciplinary violations in the Pizuach Unit and, in particular, those related to directors in the Unit, including setting measures that will be carried out from time to time to locate disciplinary incidents, to prevent their recurrence in the future and fundamentally change the Unit's organizational culture.
-  The Ministry of Agriculture, in consultation with the Civil Service Commission and the Ministry of Justice, should decide upon the continuation or termination of the employment of the inspectors and directors whose certification was revoked. Furthermore, the Ministry of Agriculture should regulate all the certifications required for the Pizuach Unit employees to perform their duties and ensure that inspectors will enforce the laws they are authorized to.
-  All of the Pizuach Unit employees should adhere to the conflict-of-interest arrangements they have signed. The management of ministry of agriculture should bring the attention of the pizuach unit's management the restrictions that apply to the operation of the employees according to their conflict of interest arrangements. The Pizuach Unit management should refrain from assigning the Unit's employees any task that may place them in a conflict of interest. It is further recommended that the Ministry of Agriculture and the Civil Service Commission jointly investigate employees who breached the conflict-of-interest arrangements they signed and consider taking the disciplinary measures available to them.



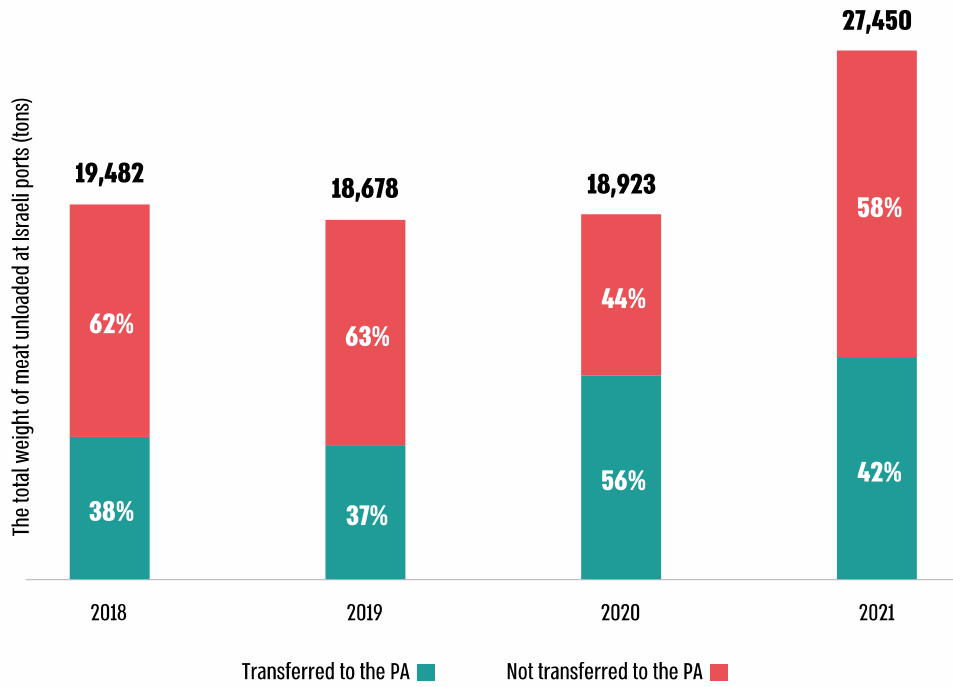
## Enforcement Data in the Pizuach Unit's Operation, 2018–2022



According to the Ministry of Agriculture data, processed by the State Comptroller's Office.



**The Amount of Meat Destined for the PA that was Unloaded at Israeli Ports and the Amount of Meat that Arrived at the Goods Border Crossings for the PA, 2018–2021**



According to the data of the Pizuach Unit, processed by the State Comptroller's Office.



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## Summary

The Pizuach Unit in the Ministry of Agriculture is of great importance, given its involvement in law enforcement in matters relating to public health, the health and welfare of animals, and the protection of agricultural plants from pests. In 2018–2022, about 20,000 cases were opened in the Pizuach system, and an investigation was launched in 21% (about 5,000). In those years, the Ministry of Agriculture imposed administrative fines of about NIS 23 million in the areas the Pizuach Unit is entrusted with enforcing.

In 2019–2022, about 39,000 transfers of plant produce from the PA to Israel were recorded in the goods border crossings between Israel and Judea and Samaria. The audit raised deficiencies that allowed uncontrolled transfer of goods between Israel and the PA, including inappropriate physical infrastructure at the goods border crossings, the lack of information sharing, and the lack of synchronization of the information systems between the bodies operating at the crossings – the Crossing Points Authority in the Ministry of Defense, (zramim) Customs and the Pizuach Unit. In this state of affairs, it is extremely difficult to prevent the phenomena of smuggling and laundering of agricultural produce, black economy, and animal cruelty is challenging. Furthermore, in a wide range of samples – 40% of the samples taken in 2022 – deviations in levels of pesticide residues were found in the plant produce transported from the PA to Israel.

The Pizuach Unit, the Crossing Points Authority, and Customs should strengthen their cooperation to ensure that the goods border crossings can fulfill their purpose: preventing the uncontrolled transfer of agricultural goods between Israel and the PA and ensuring that the Pizuach Unit has the necessary tools to carry out its duties. Furthermore, the Ministry of Health, the Ministry of Agriculture, Zramim, and the defense system should examine the existing mechanism for the transfer of plant produce from the PA to Israel and reduce the scope of the deviations in levels of pesticide residues detected in the produce transferred from the PA.

The audit findings indicate that for years, there have been integrity violations by employees and directors in the Pizuach Unit, and over the years, several disciplinary proceedings have been conducted in their case at the Civil Service Commission. This conduct also led to the closure of the Unit's intelligence array for over three years and its reestablishment in a limited and ineffective format.

The Minister of Agriculture and the Director General of the Ministry of Agriculture should fundamentally change the Pizuach Unit management and adherence to its work procedures to eradicate the recurring of disciplinary incidents and determine its order of priorities and organizational structure. The appointment of a new director for the Pizuach Unit was carried out in September 2023, together with additional required actions, including setting work goals for the Unit, ongoing supervision and control over their implementation, and examination and implementation of the recommendations of an external consulting company, may help the





Ministry of Agriculture change the work and performance results of the Pizuach Unit. Thus, the Unit can optimally fulfill its duties, primarily protecting public health, the health and well-being of animals and the flora.

