



## Foreword

The phenomenon of waste incineration by Palestinians in the Judea and Samaria region (the West Bank) has been ongoing for about 20 years and results in significant air pollution that threatens the well-being and health of both Israeli and Palestinian residents, as well as the ecological system in the area. From 2017 to 2022, air and odor pollution nuisances from these burnings expanded and intensified, adversely affecting the daily lives of Israeli and Palestinian residents. At the beginning of the 'Swords of Iron' war, leaders of local authorities in the lowlands (the Shfela) and central regions approached various government agencies, expressing complaints about the escalation of the nuisances caused by this phenomenon.

Given, these are ongoing nuisances with severe impact, requiring a systemic response, I have decided to audit this matter in 2023, and its findings are published in this report.

The waste incineration damages in the West Bank are on several levels: the first is the significant impact on the quality of life of a large population in Israel and the West Bank. This includes frequent and severe air pollution, smoke emissions, and harsh odor nuisances, which residents have been complaining about for many years without receiving a practical response for the elimination or mitigation of the phenomenon. The second is the potential health hazard to the entire population, especially vulnerable populations such as children, the elderly, and the chronically ill. And the third is the economic expression of the phenomenon. According to Office of the State Comptroller estimates, the economic cost of all air pollution damage resulting from waste incineration in the West Bank, which has transboundary effects (including morbidity and mortality effects, as well as damage to the economy and agriculture), reached from about NIS 0.88 billion to NIS 1.3 billion, at least, in 2023. Under the 'business as usual' scenario, the cumulative costs due to air pollution from waste incineration in 2023–2030 are expected to amount to about NIS 9.1 billion (after capitalization).

The audit report findings reflect a bleak situation report of failure over many years in preventing waste incineration in the West Bank and in addressing the damage it causes by the relevant governmental bodies, and they emphasize the need for urgent action to mitigate this phenomenon, while removing the barriers and failures that have led to its persistence and escalation. The audit raised that no government policy or plan has been formulated to address transboundary environmental impacts originating from the West Bank; no integrating entity has been authorized to lead the government's intervention in this matter; no infrastructure projects have been implemented to systematically handle mixed waste and electronic waste in the West Bank; and there is weakness in the coordination of activities and in the sharing of information among the government agencies involved, among other things, supervision and enforcement in the waste disposal and



burning offenses in Judea and Samaria, as well as the handling of public complaints on this matter.

On June 2023, in the course of the current audit, six years after the Office of the State Comptroller drew the Israeli government's attention, in another audit report, to the need to formulate a governmental policy for transboundary environmental management, the government resolved to establish an inter-ministerial team to lead the strategic work for this policy and prepare a plan to address waste disposal issues in the West Bank and submit its recommendations to the government. The team was established and began its activities in August 2023, but operated intermittently and only recently resumed continuous activity.

All governmental entities and bodies dealing with environmental issues in the West Bank, including the inter-ministerial team, should make a diligent effort to close the gaps that have persisted in the handling of this issue for so many years. They should coordinate and cooperate, share information to formulate and implement an operational toolbox that addresses the root problems in this matter and includes, among other things, infrastructure development and the formulation of comprehensive solutions to the systematic incineration of waste in the West Bank, as well as the establishment of enhanced monitoring and enforcement mechanisms to address the problem of waste incineration in unregulated sites in the West Bank.

Environmental pollution, ignore, man-made boundaries and is not restricted to the areas of Palestinian or Israeli localities. The geopolitical situation, the ongoing conflict between Israel and the Palestinian Authority, and the division of control over the territory complicate the handling of transboundary environmental issues, presenting a real challenge to all responsible entities. The outcomes of this audit, which include a comprehensive knowledge base and operational recommendations for effectively addressing air pollution resulting from waste incineration in the West Bank, can significantly and substantially assist various governmental entities, including the inter-ministerial team, in addressing this issue and other transboundary pollution, such as soil and water contamination. They should ensure that these pollutants are properly addressed.

The Minister of Environmental Protection and the additional minister in the Ministry of Defense (responsible for the Coordinator of Government Activities in the Territories and the Civil Administration Unit) should exercise their powers and authorities to promptly, effectively and optimally address the waste incineration in the West Bank, on all its types, from a comprehensive and broad multi-systemic perspective, for the cessation of air pollution and the long-term damage it causes to both Israeli and Palestinian residents on both sides of the border.

The Office of the State Comptroller, under my leadership, recognizes the significant importance of addressing environmental pollution hotspots, and will continue to closely monitor this issue and conduct audits, fully understanding the direct connection between



environmental protection and improving the quality of life and health of the country's  
citizens and residents.

**Matanyahu Englman**  
State Comptroller and  
Ombudsman of Israel

Jerusalem, March 2024





State of Israel

# State Comptroller of Israel

## Special Report

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Transboundary Air Pollution  
Originating from the Waste  
Incineration in the Judea and  
Samaria Region

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