



March 8, 2021

The Honorable Alejandro Mayorkas
Secretary of Homeland Security
U.S. Department of Homeland Security
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cc: The Honorable Antony J. Blinken
Secretary of State
U.S. Department of State
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The Honorable Gina Raimondo
Secretary of Commerce
U.S. Department of Commerce
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Dear Mr. Secretary,

We are authentic pro-Israel American Jewish and Rabbinic organizations, whose views are shared by the majority of informed American Jews and the general pro-Israel American public.

We are writing to urge you to maintain intact the current labeling regulations adopted and promulgated by the U.S. State Department on November 19, 2020 (the “Current Labeling Regulations”), which properly require the labels “Product of Israel,” “Israel” or “Made in Israel” on goods produced in the Jewish-Israeli-populated and Israeli-controlled Areas C and H-2 in the

historic, lawful Jewish heartlands of Judea-Samaria.¹ The U.S. Customs and Border Protection, DHS, subsequently gave notice of these Current Labeling Regulations.²

The Current Labeling Regulations: (i) are reality-based reflections of the relevant authorities; (ii) are essential for curbing antisemitic discrimination and boycotts against over 500,000 Jews and Jewish products made in the historic Jewish homelands of Judea and Samaria; (iii) reflect Congressionally-mandated trade policy and law encouraging trade with Israel and opposing anti-Israel trade restrictions and boycotts; (iv) help American kosher consumers; (v) are practical and avoid confusion; (vi) end the previous malicious measures; and (vii) are in accordance with binding international law, to which the United States is a party, which guarantees Judea and Samaria for close Jewish settlement and reconstitution of the Jewish Homeland, Israel.

In addition, the Current Labeling Regulations partially restore longstanding U.S. policy prior to 1995. Prior to 1995, U.S. Customs *required* products produced throughout Judea-Samaria (as well as in Gaza) to use labels such as “Product of Israel,” “Israel” and “Made in Israel.” The labels “West Bank” (and “Gaza”) were unacceptable as those areas were (and are) not recognized territories or political entities.³

It would be extremely harmful and deleterious to re-impose the discriminatory, outdated labeling regulations promulgated in 1995 (amended in 1997), and reissued in January 2016 (the “Boycott Facilitating Regulations”). The Boycott Facilitating Regulations wrongly *forbade* the use of the labels “Israel” or “Made in Israel” on products made anywhere in Judea-Samaria,⁴ unless excepted by statute or regulation. Incidentally, we understand that these regulations were rarely enforced.

The Boycott Facilitating Regulations fall within the definition of “boycott of, divestment from, and sanctions against Israel” under U.S. law, in that those regulations “*are politically motivated*

¹ “Marking of Country of Origin,” Press Statement by Secretary of State Mike Pompeo, Nov. 19, 2020, archived at <https://2017-2021.state.gov/markings-of-country-of-origin/index.html> (the “Current Labeling Regulations”).

² The U.S. Customs and Border Protection, DHS, “General Notice on “Country of Origin Marking of Products from the West Bank and Gaza,” Federal Register, 12/23/20, at <https://www.federalregister.gov/documents/2020/12/23/2020-28547/country-of-origin-marking-of-products-from-the-west-bank-and-gaza>

³ U.S. Customs and Border Protection Headquarters Ruling Letter (“HRL”) 718329 (Dec. 21, 1981); HRL 718125 (Nov. 12, 1981); HRL 730094 (Jan. 30, 1987); and HRL734609 (May 26, 1992). (These HRLs are summarized in T.D. 95-25, cited in the next footnote).

⁴ The since superseded Boycott Facilitating Regulations were: (i) Treasury Dep’t Statement of Policy T.D. 95-25: “Country of Origin Marking of Products From the West Bank and Gaza,” Federal Register Doc No: 95-8454 (April 6, 1995), at <https://www.govinfo.gov/content/pkg/FR-1995-04-06/html/95-8454.htm>; (ii) Treasury Dep’t Customs Service T.D. 97-16: “Country of Origin Marking of Products From the West Bank and Gaza,” at <https://www.govinfo.gov/content/pkg/FR-1997-03-14/pdf/97-6434.pdf>; and (iii) CSMS# 16-000047, “West Bank Country of Origin Marking Requirements,” Jan. 23, 2016, at <https://content.govdelivery.com/accounts/USDHSCBP/bulletins/131fe15>.

*and are intended to penalize or otherwise limit commercial relations specifically with Israel or persons doing business in Israel or in any territory controlled by Israel.”*⁵

Re-imposing the Boycott Facilitating Regulations would, among other things, facilitate anti-Jewish boycotts; discriminate against Jews living in the Jewish homeland; conflict with U.S. anti-boycott trade policy; cause U.S. labeling regulations to no longer reflect reality; require the use of labels that are deeply insulting to the Jewish people; and violate international law.

We thus request that you disregard a malicious request to rescind the Current Labeling Regulations, recently sent to you by notorious, radical anti-Israel propagandists who falsely claimed to be “pro-Israel,” but in reality promote anti-Israel policies, including trade restrictions and boycotts against the over 500,000 Jewish Israelis living in the Jewish heartlands of Judea-Samaria.⁶ These hostile-to-Israel groups’ anti-Israel policies are designed to ethnically cleanse over 500,000 Jews from their homes. This would be a prelude to Israel’s destruction. A blog on the website of one of these anti-Israel groups openly celebrates that strictly enforcing EU labeling requirements (which are similar to the labeling requirement that these anti-Israel groups asked you to re-impose on Jewish Israelis) could cause “many” Jewish factories to close and make Jewish communities in Judea-Samaria “less economically solvent.”⁷

On a personal note, we hope that your background as a Jew, as an immigrants’ rights activist, and as the child of a mother had to flee from Nazi-occupied Romania and Fidel Castro’s Cuba, has given you compassion and consideration for your fellow co-religionists, and that you will *not* revert to the Boycott Facilitating Regulations that were ultimately aimed at turning 500,000 Jews into refugees from their own historic homeland.

This is not just a matter of some technical regulations in the Federal Register. Real people’s lives and livelihoods are at stake. We would thus be happy to arrange for you to visit the Jewish communities, families, businesses and farms in Areas C and H2, so that you can see for yourself the real people who would be harmed if you rescind the Current Labeling Regulations.

⁵ 19 USC § 4452(f)(1), at https://www.law.cornell.edu/uscode/text/19/4452#f_1

⁶ Those anti-Israel groups are: J Street, Americans for Peace Now (APN), T’ruah, Ameinu, New Israel Fund (NIF), and Partners for Progressive Israel (PPI). For instance, see “*J Street Sides With Israel’s Enemies & Works to Destroy Support for Israel*,” a 144-page thoroughly-documented ZOA Special Report that details J Street’s extensive anti-Israel activities, including J Street’s promotion of boycotts, at <https://zoa.org/wp-content/uploads/2018/02/J-Street-Full-Report-H.pdf>. APN also infamously openly supports anti-Israel boycotts of products produced over the 1949 Armistice lines. NIF funds NGOs that facilitate and openly promote anti-Israel boycotts. See NGO Monitor Report on New Israel Fund, at https://www.ngo-monitor.org/funder/new_israel_fund/. PPI openly boycotted Judean wines along with a list of 200 other Israeli products, and promoted enlarging its settlement boycott to others in Israel because everything is “intertwined.” “*PPI Statement on BDS and the Targeted Boycott of the Israeli Occupation*,” at <https://web.archive.org/web/20150530071044/http://progressiveisrael.org:80/policy-statements/statement-on-boycott-divestment-and-sanctions-bds-and-the-targeted-boycott-of-the-israeli-occupation>

⁷ Partners for Progressive Israel, “Boycotts – The Successful and the Unsuccessful,” <https://www.progressiveisrael.org/boycotts-the-successful-and-unsuccessful/>

A. The Current Labeling Regulations are Reality-Based, as They Reflect Relevant Authorities:

The Current Labeling Regulations reflect the fact that **Israel has been and continues to be the relevant authority over Areas C and H2 in Judea/Samaria for the past 54 years.** Indeed, the U.S. State Department and DHS statements comprising the Current Labeling Regulations state that: *“there has been no further transfer of relevant authorities from Israel to the Palestinian Authority since issuance of the earlier guidance and Israel continues to exercise relevant authorities in areas of the West Bank.”*

In addition to Israel’s status as the relevant authority for the past 54 years, Israel is highly likely to continue to be the relevant authority in Areas C and H2 throughout the foreseeable future. The Palestinian Arabs have refused to directly negotiate with Israel throughout the last decade, and have turned down repeated peace offers throughout the past 100 years.

Moreover, over 500,000 Jewish Israelis live in Areas C and H2. Jewish Israelis comprise the overwhelming majority of these areas’ population. It would be unthinkable, Nazi-like ethnic cleansing to uproot 500,000 Jews from their homes in these vital parts of the Jewish homeland, where Jewish kingdoms existed for hundreds of years, where the Maccabees fought, and which was the site of thousands of years of Jewish history. H2 – part of Hebron – is where Jewish patriarch Abraham purchased a field for his and his wife’s burial site. Although the field was offered to Abraham as a gift, Abraham insisted on paying for it, so that no one should ever question the Jewish right to it. Jews lived in Hebron for thousands of years, until Arabs brutally massacred Hebron’s Jews in 1929. Jews returned a few years later and were slaughtered again. The Jewish people returned again at the first opportunity, resuming their thousands of years of presence there.

It would be untenable to give the Palestinian Authority – *which pays terrorists to murder Jews* – authority over this historic Jewish area and its large Jewish population.

By contrast to the over 500,000 Jews in these areas, only approximately 150,000 Palestinian Arabs live in area C.⁸ Moreover, many of these Arabs are newcomers whom the EU bused in to Area C, to occupy (or claim as a second home) new, illegal, EU-funded structures. Others are Arabs who prefer to live under Israel’s democratic rule, instead of under the corrupt, autocratic, terror-besotted Palestinian Authority. Arabs in the area also work in Jewish businesses; and thus facilitating anti-Jewish boycotts harms Jewish and Arab workers alike.

Israel’s retention of these areas is also essential for Israel’s security: Without these areas, Israel would be an impossible-to-defend less than 9 miles wide.

Israeli wines, agricultural, industrial and other products sought by Jewish and pro-Israel American consumers are produced in Areas C and H2.

⁸ “Analysis: So, How Many Arabs Live in Area C?,” JNi Media, Jan. 10, 2016, at <https://www.jewishpress.com/news/analysis-so-how-many-arabs-live-in-area-c/2016/01/10/>

It is thus properly reflects reality and relevant authorities to use labels such as “Product of Israel,” etc. for products made in Areas C and H2.

The statements promulgating and noticing the Current Labeling Regulations also “*recognize[] that Israel has disengaged from Gaza and that Gaza and the West Bank are politically and administratively separate and should be treated accordingly. In light of these developments, and consistent with the purposes of 19 U.S.C. 1304 of providing important information to U.S. purchasers, the Department of State recommends that the country of origin marking requirements for goods produced in the West Bank or Gaza be Current.*”

Accordingly, it would be improper to re-impose the Boycott Facilitating Regulations which improperly treated the “West Bank” and Gaza as one unit.

We thus request that you maintain the Current Labeling Regulations, which provide as follows:

- Goods produced in the territorial areas of the West Bank where Israel continues to exercise relevant authorities—specifically Area C under the Oslo Accords and the area known as “H2” which is under Israeli administrative control consistent with the 1997 Hebron protocol—must be marked as “Israel,” “Product of Israel,” or “Made in Israel.”
- Goods produced in Areas A and B under the Oslo Accords, which are under the civilian oversight of the Palestinian Authority for these purposes, along with the area known as “H1” from the 1997 Hebron Protocol, must be marked as “West Bank,” “Product of West Bank,” or “Made in West Bank.”
- Goods produced in Gaza must be marked as “Gaza,” “Product of Gaza,” “Made in Gaza,” “Gaza Strip,” “Product of Gaza Strip,” or “Made in Gaza Strip.”
- Goods from any of these territorial areas must not be marked in conjunctive form, such as “West Bank/Gaza,” “West Bank/Gaza Strip,” “West Bank and Gaza,” or words of similar meaning.

B. The Current Labeling Regulations are Essential for Carrying Out U.S. Anti-Boycott and Anti-Trade-Impediment Policies Towards Israel, and for Curbing Antisemitic Discrimination and Boycotts Against Jews and Jewish Products Made in Judea/Samaria

The U.S. Constitution, Article I, Section 8, Clause 3, grants Congress express authority over the regulation of foreign trade: “*The Congress shall have Power . . . To regulate Commerce with foreign Nations.*”

Commencing with anti-boycott legislation enacted in the 1970s, Congress has had a longstanding policy of opposing anti-Israel boycotts and trade impediments.⁹ The Current Labeling

⁹ Laws opposing anti-Israel boycotts include(d): (i) Tax Reform Act of 1976, Public Law 94-455; 90 Stat. 1520 (Ribicoff Amendment), codified at 26 U.S. Code § 999, which denies certain tax benefits to entities abiding by the Arab League Boycott of Israel; (ii) 1977 amendments to the Export Administration

Regulations are essential for carrying out this policy. By contrast, the Boycott Facilitating Regulations contradict Congressional legislation and policy statements on matters over which Congress has express authority.

Recently-enacted laws oppose boycotts as well as other trade impediments (e.g., labeling requirements); and specifically define boycotts against Israel to include those aimed at “territories controlled by Israel.”

For instance, the Bipartisan Congressional Trade Priorities and Accountability Act of 2015 (Trade Promotion Authority, or “TPA”), enacted on June 29, 2015,¹⁰ provides that “principal trade negotiating objectives of the United States” include:

“(i) **To discourage actions** by potential trading partners **that directly or indirectly prejudice or otherwise discourage commercial activity solely between the United States and Israel.**

(ii) To discourage politically motivated boycotts of, divestment from, and sanctions against Israel and **to seek the elimination of politically motivated nontariff barriers on Israeli goods, services, or other commerce imposed on Israel. . . .**”¹¹

The TPA moreover defines “actions to boycott, divest from, or sanction Israel” to mean:

“actions by states, non-member states of the United Nations, international organizations, or affiliated agencies of international organizations that are politically motivated and are **intended to penalize or otherwise limit commercial relations specifically with Israel or persons doing business in Israel or in Israeli-controlled territories.**”¹²

Requiring Israeli-made products to be labeled as from the “West Bank,” and prohibiting labels that indicate that these are products of Israel, would constitute a politically-motivated nontariff

Act of 1969; (iii) the Export Administration Act of 1979, 50 U.S.C. § 4601 et seq., ensuring compliance with boycott reporting requirements (continued in effect pursuant to the International Emergency Economic Powers Act, 50 U.S.C. 1701 et seq.); (iv) the Anti-Boycott Act of 2018, Part II, Title XVII, Subtitle B of Pub. L. 115-232, 132 Stat. 2208 (enacted on August 13, 2018, as part of the John S. McCain National Defense Authorization Act for Fiscal Year 2019), codified at 40 U.S.C. §§ 4841-4843; (v) the Bipartisan Congressional Trade Priorities and Accountability Act of 2015, Pub. L. 114–26, title I, § 102, 129 Stat. 320, June 29, 2015, at <https://www.congress.gov/114/plaws/publ26/PLAW-114publ26.pdf>, codified at 19 USC § 4201(b)(20), at https://www.law.cornell.edu/uscode/text/19/4201#b_20 (the “TPA”); and (vi) the Trade Facilitation and Trade Enforcement Act of 2015, Pub. L. 114–125, title IX, § 909 (“United States-Israel Trade and Commercial Enhancement”), 130 Stat. 273, Feb. 24, 2016 (“TFTEA”), <https://www.congress.gov/bill/114th-congress/house-bill/644/text>, codified at 19 U.S. Code § 4452, https://www.law.cornell.edu/uscode/text/19/4452#f_1. In addition, the U.S. has ensured via free trade agreements (e.g., with Bahrain and Oman) and by conditioning World Trade Organization membership (e.g. with Saudi Arabia) that countries no longer participated in anti-Israel boycotts.

¹⁰ Full citation information for the TPA and TFTEA is contained in the previous footnote.

¹¹ 19 USC § 4201(b)(20)(A).

¹² 19 USC § 4201(b)(20)(B).

barrier on Israeli goods. Placing such U.S. barriers on Israeli-made goods from Judea and Samaria would gut our ability to obtain our principle trade objectives.

The TPA’s “principle trade negotiating objectives” are also reiterated in the United States-Israel Trade and Commercial Enhancement” provisions of the Trade Facilitation and Trade Enforcement Act of 2015 (enacted Feb. 24, 2016) (“TFTEA”).¹³

The TFTEA also declares that Congress “supports efforts to prevent investigations or prosecutions by governments or international organizations of United States persons solely on the basis of such persons doing business with Israel, with Israeli entities, **or in any territory controlled by Israel.**”¹⁴

TFTEA also requires the White House to report annually to Congress on trade barriers against Israel, including trade barriers against “Israeli controlled territories,” and to describe U.S. efforts to discourage and dismantle such barriers.¹⁵ Surely, the U.S. should *not* be imposing the same sorts of barriers that the White House is supposed to be dismantling.

The TPA and TFTEA were (in part) aimed at ending European Union (“EU”) labeling regulations that discriminate against Israeli goods from Judea-Samaria. Similar to the discriminatory Boycott Facilitating Regulations discussed here, EU labeling efforts prohibited Israeli products from Judea and Samara from carrying “Product of Israel” labels, and facilitated anti-Israel boycotts.

In addition to enacting the TPA and TFTEA, thirty-six bipartisan Senators, led by Senators Kirsten Gillibrand (D-NY) and Ted Cruz (R-TX), sent a letter to the EU on November 9, 2015, underlining that such labeling requirements promote *de facto* anti-Israel boycotts.¹⁶ The bipartisan Senate letter, equally applicable here, stated in pertinent part:

*“As allies, elected representatives of the American people, and strong supporters of Israel, we urge you not to implement this labeling policy, which appears intended to discourage Europeans from purchasing these products and **promote a de-facto boycott of Israel, a key ally and the only true democracy in the Middle East.** We believe strongly that these efforts are unwarranted, dangerous, and damaging to the prospects of a negotiated solution to this conflict.*

We are also deeply concerned that enacting this policy would lead to the broader boycott of Israel. For decades, it has been the policy of the United States to oppose economic boycotts by other countries against Israel. In the 1970s, the United States Congress enacted legislation making it illegal for a U.S. company to comply with the Arab League boycott of Israel. This year, Congress has passed Trade Promotion

¹³ 19 USC § 4452(c)(1).

¹⁴ 19 U.S.C. § 4452(b)(7).

¹⁵ 19 U.S.C. § 4452(d).

¹⁶ “Sens. Cruz and Gillibrand Lead Bipartisan Letter to the EU Opposing New Guidelines for Israeli Product Labeling: PROPOSED EU POLICY COULD PROMOTE A DE FACTO BOYCOTT OF ISRAEL,” Nov. 9, 2015, at https://www.cruz.senate.gov/?p=press_release&id=2511

Authority (TPA) legislation requiring the United States to discourage Europe from enacting any politically motivated policies that would boycott, divest from, or sanction Israel when negotiating the Transatlantic Trade and Investment Partnership. Differentiating between products made by Israeli companies creates a troubling precedent that could eventually lead to the type of activities that the TPA provisions aim to address.

*At a time of significant instability in the region, it is deeply concerning to us that the EU is considering a proposal intended to impose more diplomatic and economic pressure on Israel. **The proposed labeling guidelines play into the narrative of the Boycott, Divestment, and Sanction (BDS) movement, which is an effort to delegitimize Israel rather than promote a resolution of outstanding issues between Israel and the Palestinians. Far from advancing such a resolution, the proposed labeling would prejudge the outcome of future negotiations.***

We call upon you not to adopt the proposed labeling guidelines. Thank you for your attention to this important matter.”

Indeed, discrimination against Jews or Jewish products from Judea-Samaria is a “gateway drug” leading to discrimination against all of Israel. For instance, one of the anti-Israel groups that wrote to you “graduated” from a boycott of products from Judea-Samaria to a broader anti-Israel boycott, with the following explanation: “*The economy of the settlements and the West Bank is too intertwined with the Israeli economy as a whole for it to be possible to limit the boycott to products of the settlements.*”¹⁷

In accordance with Congressional policy to eliminate trade impediments and boycotts against America’s important ally Israel, it is thus vital to retain the Current Labeling Regulations

C. The Label “West Bank” is Insulting, Historically Inaccurate, Overwhelmingly Opposed, and Wrongly Ignores that Israel Has The Lawful Right to These Territories Under International Law

Jews have lived in Judea-Samaria since ancient times, except from 1948 to 1967, when Jordan seized and illegally occupied them and expelled the Jews, after six Arab nations invaded Israel in 1948-1949. These territories never belonged to Jordan or to the Palestinian Arabs, who never had sovereignty or sovereign rights there.

The areas were moreover known as Judea-Samaria for thousands of years. United Nations Resolution 181 (passed on November 29, 1947)¹⁸ never used the term “West Bank” – which was not yet invented at that time – and instead referred to the area as “the hill country of Samaria and Judea.” Shortly after Jordan began its 19-year illegal occupation of these areas, Jordan renamed Judea-Samaria the “West Bank” in order to try to de-Judaize these areas.

¹⁷ “PPI Statement on BDS and the Targeted Boycott of the Israeli Occupation,” at <https://web.archive.org/web/20150530071044/http://progressiveisrael.org:80/policy-statements/statement-on-boycott-divestment-and-sanctions-bds-and-the-targeted-boycott-of-the-israeli-occupation>

¹⁸ <https://unispal.un.org/DPA/DPR/unispal.nsf/0/7F0AF2BD897689B785256C330061D253>

In 2019, the World Zionist Congress, an elected body representing Jews from throughout the world, enacted a resolution to end the use of the term “West Bank.”¹⁹

Forcing Israeli farmers to label their products with the invented Jordanian name “West Bank” is thus historically inaccurate and insulting to Israelis and the pro-Israel community.

Most significantly, requiring the label “West Bank” for products from Areas C and H2, and prohibiting products from those areas to be labeled “Produced in Israel” ignores that Israel has the right to these areas under binding international law, including: the [San Remo Resolution](#) (which made the Balfour Declaration a legally binding international obligation),²⁰ the [British Mandate](#)²¹ (which made the Mandatory (Britain) responsible to “*secure the establishment of the Jewish national home*,” and “*for seeing that no Palestine territory shall be ceded or leased to, or in any way placed under the control of, the Government of any foreign Power*,” and recognized “*the historical connection of the Jewish people with Palestine and to the grounds for reconstituting their national home*,” (in the Mandate territory which included Judea-Samaria); the [Anglo-American Treaty of 1924](#),²² (a binding U.S. treaty reiterating and agreeing to the Mandate, and designating the area including Judea/Samaria as a “sacred trust” for “reconstituting” the Jewish homeland); and [UN Charter Article 80](#)²³ (which preserved intact all rights granted to the Jewish people under the Mandate, even after the Mandate’s expiration, and prohibits the UN and other foreign entities from transferring the Jewish people’s rights to a non-Jewish entity²⁴).

D. Re-Imposing the Boycott Facilitating Regulations Would Be Discriminatory, Cause Suffering, and Make Peace Less Likely

Re-imposing the Boycott Facilitating Regulations would single out Israel for unfair, discriminatory treatment not accorded to other nations whose rights to certain areas are challenged by other parties.

¹⁹ See “World Zionist Congress Adopts ZOA’s Strong/Important Pro-Israel Resolutions,” Nov. 6, 2019, <https://zoa.org/2019/11/10427477-world-zionist-congress-adopts-zoas-strong-important-pro-israel-resolutions/>

²⁰ “The San Remo Conference,” Jewish Virtual Library, at <https://www.jewishvirtuallibrary.org/the-san-remo-conference>

²¹ “British Palestine Mandate: Text of the Mandate (July 24, 1922),” Jewish Virtual Library, <https://www.jewishvirtuallibrary.org/text-of-the-british-mandate-for-palestine>

²² “Convention Between the United States of America and Great Britain, signed at London, December 3, 1924,” Treaty Series No. 728, at https://www.jewishvirtuallibrary.org/jsourc/H/History/US_UK_Convention_1924.pdf

²³ “Charter of the United Nations (June 26, 1946), <https://www.jewishvirtuallibrary.org/charter-of-the-united-nations>

²⁴ Howard Grief, “Article 80 and the UN Recognition of a “Palestinian State,” *Algemeiner*, Sept. 22, 2011, <https://www.algemeiner.com/2011/09/22/article-80-and-the-un-recognition-of-a-“palestinian-state”/>

In addition, the Boycott Facilitating Regulations would harm both Arabs and Jews employed by businesses in Areas C and H2. Numerous Arabs and Jews have already lost jobs due to discriminatory actions against Jewish businesses in Judea-Samaria.

American kosher and pro-Israel consumers will also be confused if they see “West Bank” labels on Israeli products.

Finally, re-imposing the Boycott Facilitating Regulations would make peace *less* likely. It would encourage the Palestinian Authority and Palestinian terror groups to avoid sitting down to make peace. Those regulations would instead encourage the PA and Palestinian terror groups to continue to terrorize and push for the ethnic cleansing of over 500,000 Jews from the Jewish heartland, and the ethnic cleansing of every Jew from Israel.

For all these many reasons, we urge you to retain the sensible, non-discriminatory Current Labeling Regulations adopted and promulgated by the U.S. State Department on November 19, 2020, and noticed by U.S. Customs and Border Protection/DHS in December 2020.

Sincerely,

Morton A. Klein, National President, The Zionist Organization of America

The Zionist Organization of America (“ZOA”)

Students Supporting Israel (“SSI”)

Emunah of America

The Coalition for Jewish Values (“CJV,” comprised of over 1,500 American Rabbis)

The Coordinating Council for the Jewish Homeland (“CCJH”)

The Rabbinical Alliance of America / RAA Igud HaRabbonim

Americans Against Antisemitism (led by Democratic NY State Assemblyman Dov Hikind)

Chovevei Zion

Conference of Jewish Affairs (“CJA”)

The Lawfare Project

Endowment for Middle East Truth (“EMET”)

Hasbara Fellowships

[Signatures continue on next page]

Americans for Peace and Tolerance (“APT”)

Russian American Jewish Experience USA (“RAJE USA”)

American Friends of Likud (“AFL”)

EZRA USA - US National Movement of Young Russian Jews

One Israel Fund (“OIF”)

Americans for a Safe Israel (“AFSP”)

Jewish Channel Institute (“JCI,” Mikhail Nemirovsky, Chair)

Aharai

Illinois Association of Compatriots “Zemlyaki” (Arkadiy Kleban, President)

The Assembly of the World Diasporas (NY & Chicago, Leonid Bard, Chair)

American Friends of Ateret Cohanim

Young Jewish Conservatives (“YJC”)