

To:

Alex Wright, Head of Regulation and Improvement, Office of the Scottish Charity Regulator (OSCR)

By email: info@oscr.org.uk

Date: 6 February 2026

Please find attached our complaint regarding the following organisation, which is currently on the Scottish Charity Register.

KKL (Scotland) Charitable Trust, also known as JNF KKL Scotland

Charity Number: SC037850

Company number SC316740

Please note that this complaint is not being raised via OSCR's Online Concern Form because there is no option to select the relevant issue: that this organisation is not complying with its legal duties under the 2005 Act and does not provide public benefit.

OSCR must weigh any public benefit that a charity claims to provide against any disbenefit, i.e., detriment or harm caused to the public by their activity. To date, OSCR has consistently failed to properly consider the purpose and objectives of this organisation and the harm caused by JNF KKL Scotland's activities.

At a time when we are witnessing the erosion of established rules and principles, especially those governing state behaviour, we expect OSCR to conduct a thorough investigation and not allow JNF KKL Scotland and its parent organisation, KKL-JNF Israel, a founding and corporate member, to abuse and erode public trust in charity regulation.

It is our expectation that if the investigation confirms the information in the enclosed document, the result will be to commence the formal process of revoking the charitable status of JNF KKL Scotland.

We raise our complaint as an organisation, amongst many Scottish civil society organisations that are concerned with the abuse and violations of the rights of the Palestinian people, including refugees denied return to their land and homes and the Palestinians who make up 21.5% of the citizens of Israel.

Summary

In this document, KKL (Scotland) Charitable Trust will be referred to by its other name, JNF KKL Scotland. The direct English translation of the Hebrew name '*Keren Kayemeth Lelsrael*' is '*Perpetual Fund for the Jewish People*'. JNF stands for *Jewish National Fund*.

JNF KKL Scotland is a registered Scottish charity governed by the provisions of the Charities and Trustee Investment (Scotland) Act 2005 (2005 Act) and subject to oversight by the Scottish Charity Regulator (OSCR).

JNF KKL Scotland is a fundraising office of the Israeli organisation called KKL-JNF, which is incorporated under the laws of the State of Israel and has special privileges and functions that are parastatal in nature. JNF KKL Scotland received a grant of £10,000 from KKL-JNF Israel to establish the charity in Scotland¹. KKL-JNF Israel is 'one of two founding members and remains a corporate member of KKL (Scotland) Charitable Trust'².

Stanley Lovatt, Chairman of JNF KKL Scotland from 2007 to 2011, is currently Honorary President of JNF KKL Scotland as well as Honorary Consul for Israel in Scotland³. Since its establishment in 2007, JNF KKL Scotland has raised funds exclusively for KKL-JNF Israel⁴.

The KKL-JNF and their local fundraising offices, of which JNF KKL Scotland is one, are not benign organisations established for the public good. Their proudly declared history, purpose and impact on people they have had a hand in making refugees, and their ongoing commitment to contribute to the ethnic cleansing of Palestinians from their homes clearly show they should never have been registered as a charity. The harm they cause far outweighs any public benefit they claim.

OSCR should not allow such an organisation to enjoy charity status, which only benefits a foreign government engaged in genocide, apartheid and ethnic cleansing. The significant benefits that JNF KKL Scotland and KKL-JNF Israel enjoy due to charity status lead directly to support for these crimes, for the military that perpetrates violations of international law and of human rights, and for violent settler organisations that are actively stealing Palestinian land.

For as long as JNF KKL Scotland and KKL-JNF continue to be registered as a charity in Scotland, OSCR will lose credibility and public trust. We urge OSCR to follow the Canada Revenue Agency decision to revoke the charity status of JNF Canada⁵ and remove JNF KKL Scotland from the Scottish Charity Register immediately.

¹ The KKL (Scotland) Charitable Trust Trustees' Report and Unaudited Financial Statements, [For the period ended 31 March 2008](#)

² The KKL (Scotland) Charitable Trust Trustees' Report and Unaudited Financial Statements, [For the period ended 31 March 2025](#)

³ The Jewish Chronicle, Lovatt is Scots' link to Israel, [3 June 2011](#)

⁴ Jewish Telegraph, JNF KKL Scotland and JNF UK Bury the Hatchet, [27 September 2019](#)

⁵ L'Orient Today, Canadian Jewish National Fund loses final appeal to regain revoked charitable status, [9 June 2025](#)

What is the KKL-JNF?

The Jewish National Fund (JNF) was established at the Fifth Zionist Congress in Basel, Switzerland, in 1901. The Hebrew name of the JNF is Keren Kayemeth Lelsrael (KKL) and is known as KKL-JNF in Israel.

The KKL-JNF Fundraising Division ‘works in the second decade of the 21st century in more than 55 countries...’⁶ JNF KKL Scotland appears on the list of KKL-JNF ‘local offices’⁷

The KKL-JNF’s Memorandum of Association states its primary object⁸:

To purchase, acquire on lease or in exchange, or receive on lease or otherwise, lands, forests, rights of possession, easements and any similar rights as well as immovable properties of any class, in the prescribed region (which expression shall in this Memorandum mean the State of Israel in any area within the jurisdiction of the Government of Israel) or in any part thereof, for the purpose of settling Jews on such lands and properties.

On its website, the organisation boasts that ‘KKL-JNF was founded in 1901 and since then it has served as the operational arm of Zionism.’ The organisation is explicit about its role in building a settler colonial state on the land of historic Palestine:

Before the establishment of the state, KKL-JNF already carried out and was a partner to pathbreaking projects, which changed reality. These projects include establishing the Tower & Stockade settlements (1936-9), founding the three border lookouts of Gvulot, Beit Eshel and Revivim (1943) and establishing 11 settlements in the Negev in the middle of the night (1946).

Since then, and until the second decade of the 21st century, KKL-JNF has executed thousands of projects on Israel's land. These projects include establishing hilltop villages in the Galilee, buildings security roads on Israel's borders, preparing land for agriculture and for living in the Arava, the Golan and the Negev, developing public areas in cities, installing mobile shelters in border villages, and building infrastructure for settlements that absorb the people evacuated from Gush Katif.⁹

The main objective of the Zionist movement, a settler colonial movement which originated as a form of European nationalism, is to colonise and settle the land of historic Palestine to establish a state that privileges those with 'Jewish nationality' over the indigenous Palestinians already living on the land. By their own account, KKL-JNF, in

⁶ [About KKL-JNF](#)

⁷ KKL-JNF website, [Contact your local office](#)

⁸ Keren Kayemeth Lelsrael, [Memorandum and Articles of Association](#)

⁹ KKL-JNF: For a Sustainable Future for Israel, <https://www.kkl-jnf.org/about-klk-jnf/klk-jnf-id/goals-actions/>

partnership with their worldwide local offices, continue to ensure there is a ‘changed reality’ on the ground inside Israel today and in the illegally occupied territories.

In 2023, the then Chair of KKL-JNF Yifat Ovadia Lusky, said in a statement titled ‘*KKL-JNF and the State of Israel Through 75 Years of Zionism and National Development*’:

From the earliest days of Zionism and the Return to Zion, over 120 years, the KKL-JNF has been working and influencing the shaping of the State. KKL-JNF plays a part in building the conceptual and organizational framework for the establishment of the State. To this day we are involved in developing the country, we continue to manage and cultivate forests and open spaces, we are building and opening roads and trails, we are absorbing immigration, investing in the periphery, and assisting with settlement.¹⁰

A key figure in the history of the Zionist movement, Joseph Weitz, head of KKL-JNF’s settlement department, wrote in 1940 about what should happen to the indigenous Palestinian population:

Transfer does not serve only one aim — to reduce the Arab population — it also serves a second purpose by no means less important, which is: to evict land now cultivated by Arabs and to free it for Jewish settlement. The only solution is to transfer the Arabs from here to neighbouring countries. Not a single village or a single tribe must be left off.¹¹

It should be clear to us that there is no room in Palestine for these two peoples. No ‘development’ will bring us to our goal of independent nationhood in this small country. Without the Arabs, the land will become wide and spacious for us; with the Arabs, the land will remain sparse and cramped.¹²

The ‘operational arm of Zionism’

KKL-JNF, led by Joseph Weitz, was part of what is known as the ‘Village Files’, whose work is described by Israeli historian Ilan Pappé:

Precise details were recorded about the topographic location of each village, its access roads, quality of land, water springs, main sources of income, its socio-political composition, religious affiliations, names of its mukhtars, its relationship with the other villages, the age of individual men (sixteen to fifty) and many more. An important category was an index of ‘hostility’ (towards the Zionist project, that is), decided by the level of the village’s participation in the revolt of 1936. There was a list of everyone who had been involved in the revolt and the families of those who had lost someone in the fight against the British. Particular attention was given to people who had allegedly killed Jews. As we shall see, in

¹⁰ KKL-JNF and the State of Israel Through 75 Years of Zionism and National Development, [21 April 2023](#)

¹¹ Ilan Pappé, *The Ethnic Cleansing of Palestine* (Oxford: Oneworld Publications Limited, 2006)

¹² Michael Fischbach, *Records of Dispossession: Palestinian Refugee Property and the Arab-Israeli Conflict* (New York: Columbia University Press, 2003)

*1948, these last bits of information fuelled the worst atrocities in the villages, leading to mass executions and torture.*¹³

These Village Files were used by Zionist militias in 1947-1948 to carry out massacres, to destroy whole villages and expel Palestinians from their homes.

For KKL-JNF, Joseph Weitz is a revered figure. There are multiple references to Weitz in its own timeline of KKL-JNF history, including the following:

*Weitz, who had hit upon this response to the twin challenges of immigrant employment and making the land bloom, dubbed the period "the blossoming of the wilderness," and promoted the establishment of "labor villages" which subsequently became moshavim. During these years, he said, KKL-JNF "underwent a metamorphosis – from the redemption of land from the hands of others to the redemption of land from the chains of wilderness."*¹⁴

KKL-JNF, together with its local fundraising office in Scotland, continues its role as the 'operational arm of Zionism'. What Weitz describes as 'redemption of land from the hands of others' is in practice the ethnic cleansing of the Palestinian people from their land and homes.

In 2004, the Charity Commission rejected an application by Good News for Israel for charity registration on the basis that it "is not established for exclusively charitable purposes"¹⁵. In reaching this conclusion, the Commission noted that "the case of *Keren Kayemeth Le Jisroel Ltd v IRC* [1931] 2 KB 465... established that settling Jewish people in the Holy Land was not a charitable purpose as advancing religion because it involved considerations which were not exclusively charitable".

JNF KKL Scotland describes its objectives as 'the relief of poverty, the advancement of education, the advancement of environmental protection or improvement... all to be based in the State of Israel'.¹⁶

However, these activities in what is now Israel and the Occupied Territories, when the history and purpose of KKL-JNF Israel are properly considered, cannot be related to the relief of poverty since *'it is not the improvement of poor Jews and their families that is the characteristic purpose of the Association. It is rather the repopulation of the Holy Land and other lands in a wide area around it, so that once more the population of that district may be Jewish'*.¹⁷

¹³ Ilan Pappé, *The Ethnic Cleansing of Palestine* (Oxford: Oneworld Publications Limited, 2006)

¹⁴ KKL-JNF Israel, [The Fifth Decade: 1941-1950](#)

¹⁵ Charity Commission, Application for registration of Good News for Israel, Decision made on 5th February 2004, p.1, <http://www.charitycommission.gov.uk/Library/start/gnfiledecision.pdf>

¹⁶ The KKL (Scotland) Charitable Trust Trustees' Report and Unaudited Financial Statements, [For the period ended 31 March 2025](#)

¹⁷ *Keren Kayemeth Le Jisroel Ltd v IRC* [1931] 2 KB 465

Keren Kayemeth Le Jisroel is an alternative spelling of Keren Kayemeth Lelsrael, the Hebrew name for the JNF, and the 1931 case was an early attempt by the KKL-JNF to secure tax exemption for funds raised in the UK. In the 2004 Good News for Israel decision, the Charity Commission made an important note that there are ‘*implications which went beyond the religious and spiritual and included political, economic, social and civil order implications* and that ‘*it was not possible for either the Court or the Commission to determine whether the purpose [of promoting the settling of Jews in Israel] was beneficial to the public or not*’.¹⁸

Israeli citizenship and Jewish nationality

To understand the role of the KKL-JNF, it is important to know that the State of Israel makes a key distinction between Israeli citizenship and nationality. Joseph Schechla, coordinator of the Habitat International Coalition’s Housing and Land Rights Network explains:

Israeli law, official institutions or records do not recognize an “Israeli nationality” status. Israel’s High Court already has confirmed that no such status exists. Whereas the State of Israel has established only Israeli citizenship. The only nationality conferring automatic status to enjoy all civil, political, economic, social and cultural rights in Israeli law is “Jewish nationality.”

A practical feature of “Jewish nationality” is that Israel and its “national” (parastatal) institutions, including the World Zionist Organization/Jewish Agency (WZO/JA) and Jewish National Fund (JNF), apply this status both in developing and distributing confiscated Palestinian assets inside Israel and the occupied Palestinian territory, as well as through their extraterritorial activities. The scope of this program is vast. Mobilizing Jewish settlers/immigrants and financial resources from their operations in some 50 other countries, the “national” institutions function tax-free outside Israel, while performing as part of a foreign State.¹⁹

In May 2012, the Haifa District Court rejected an appeal by Professor Uzzi Ornan to recognise him as an Israeli national. In 2007, a group of Israeli citizens also took legal action so that the Israeli state would recognise their nationality as ‘Israeli’. They failed, even though the “government records the nationality of Israeli citizens as ‘Israeli’ on their passports, it has consistently refused to do so for internal state purposes”.²⁰

The refusal of Israeli courts to allow ‘Israeli’ nationality to be entered into the Population Registry is not an administrative detail since it reveals the nature of the State of Israel as being as state that privileges one group of people over others. This has very real

¹⁸ Charity Commission, Application for registration of Good News for Israel, Decision made on 5th February 2004, p.5, <http://www.charitycommission.gov.uk/Library/start/gnfiddecision.pdf>

¹⁹ Schechla, J., “Jewish Nationality,” “National Institutions” and Institutionalized Dispossession (2004), BADIL Resource Center for Palestinian Residency and Refugee Rights, al-Majdal

²⁰ Izenberg, 22 February 2007, There are 132 categories of classification; 'Israeli' is not one of them: <http://www.jpost.com/Israel/Article.aspx?id=52303>

implications for Palestinian, non-Jewish, citizens of Israel, including where non-Jewish citizens are allowed to live. Such legal definitions would be contrary to public policy in the UK and would not be tolerated by citizens.

The privileging of Jewish citizens over Palestinian, non-Jewish, citizens is conferred via their 'Jewish nationality' and is of critical importance when examining the suitability of JNF KKL Scotland for charity status, since this is the context, core to the values of JNF KKL Scotland and KKL-JNF, within which the organisation operates. The name 'Jewish National Fund' embodies this commitment to privileging Jews as bearers of a 'nationality'.

The status of KKL-JNF in Israel

In Israel, KKL-JNF is a para-statal organisation with a leading role in land development, administration, and forestation. KKL-JNF directly controls 13% of the land in the state of Israel, and its role is to hold that land as 'the perpetual property of the Jewish People'.

In total, 93% of Israel's land is public, including land directly controlled by KKL-JNF. The government agency responsible for managing this land is the Land Authority Council (LAC), where KKL-JNF holds 6 out of 13 seats.²¹ This gives the KKL-JNF significant power and influence over Israeli land administration and development.

The underlying basis for all legislation and policy related to the administration, development of land and forestation in Israel is based on the Israel Lands Law (1960).

The following is the Israeli Parliament's summary of this Basic Law:

*"The basis of the law is the special relationship between the People of Israel and the Land of Israel and its redemption. The law ensures that the state lands, which constitute about 90% of the lands in the state, should remain national property. The law prohibits the transfer of ownership over lands owned by the state, the Development Authority or the Jewish National Fund, either by sale or by any other means, with the exception of types of land or transactions, that have been specified in the law."*²²

The Israel Lands Law (1960) enshrines in law the state's founding Zionist ideology, that the state of Israel is for 'the People of Israel', which is a reference to all Jewish people around the world and not the citizens of the state of Israel, which include non-Jews. 'Redemption' means acquiring land for exclusively Jewish benefit.

Amnesty International reports provide an authoritative overview of the role of the KKL-JNF in the establishment of a discriminatory land regime and allocation of expropriated Palestinian land for Jewish settlement.²³

²¹ About Israel Land Authority, https://www.gov.il/en/pages/about_rami

²² The Knesset, Basic Laws, <https://main.knesset.gov.il/en/activity/pages/basiclaws.aspx>

²³ Israel's apartheid against Palestinians: Cruel system of domination and crime against humanity, <https://www.amnesty.org/en/documents/mde15/5141/2022/en/>

Forestation

KKL-JNF is also responsible for forestation, a role established by the 1961 Covenant between KKL-JNF and the Israeli government. The Covenant established the KKL-JNF chief forester as Israel's national forest commissioner and agreed *"to concentrate the administration, conservation and care of these lands in the hands of the State and to strengthen the hands of Keren Kayemeth Lelsrael in fulfilling its mission of redeeming land"*.²⁴

In December 1948, United Nations resolution 194 raised the issue of Palestinian refugees and provided that *"the refugees wishing to return to their homes and live at peace with their neighbours should be permitted to do so at the earliest practicable date, and that compensation should be paid for the property of those choosing not to return and for loss of or damage to property which, under principles of international law or in equity, should be made good by the Governments or authorities responsible"*.²⁵

In response to UN resolution 194, which endorsed the right of Palestinian refugees to return, to "forestall international indignation over collective dispossession" and violate their obligations under international law, the Israeli government brought all confiscated Palestinian land under government custodianship. The Israeli government then transferred, "at a bargain price", 1 million dunam of land to KKL-JNF. An additional quarter million dunams were transferred to KKL-JNF in 1949.

One of the key roles of JNF KKL Scotland, in conjunction with KKL-JNF in Israel and the Israeli government, is and always has been to prevent the return of Palestinian refugees to their villages and land. This activity violates basic principles of justice and international law, which enshrine the right of refugees to return to their homes. Some of the land was used to establish exclusively Jewish settlements to further erase the memory of Palestinian villages.

KKL-JNF forestation also plays a role in denying the existence of a whole people, who fled war or were driven out by Zionist militias. The trees and reservoirs funded by JNF KKL Scotland in KKL-JNF parks and forests are there to cover up the stones from the destroyed Palestinian homes and to erase any trace of Palestinian life.

Activities in illegally occupied territories and support for Israeli military

KKL-JNF is open about its activities in the Golan²⁶, which is considered illegally occupied by Israel under international law. In 2019, the British government reaffirmed their view that:

...the Golan Heights as territory occupied by Israel. Annexation of territory by force is prohibited under international law, including the UN Charter.

²⁴ KKL-JNF-Israeli Government Covenant, <https://www.kkl-jnf.org/about-kl-jnf/kl-jnf-id/kl-jnf-israeli-government-covenant/>

²⁵ UN General Assembly resolution 194, https://unsco.unmissions.org/sites/default/files/ga_res_1941948.pdf

²⁶ Zionism and Nature in Northern Israel, <https://www.kkl-jnf.org/about-kl-jnf/green-israel-news/green-israel-news-2020/teachers-seminar-aussie-nz-1120.aspx>

*We did not recognise Israel's annexation in 1981 and have no plans to change our position.*²⁷

KKL-JNF also operates in the occupied West Bank, Palestinian land illegally occupied and settled by the State of Israel. Initially, KKL-JNF worked through Himnuta, a subsidiary. KKL-JNF has also been involved with Elad, a settler organisation, to take over Palestinian homes in Silwan village on the outskirts of the Old City of Jerusalem.^{28 29}

An Israeli newspaper Haaretz editorial reports in 2023 about the role of KKL-JNF today in funding settler movements in the Occupied West Bank:

"This project operates in social and geographic peripheral areas and in farms across the country," JNF said in response. But the occupied territories aren't the periphery, and "agricultural farms" in the West Bank lie outside Israel's borders. And judging by its response, JNF is indifferent to their illegality. "The JNF is active in educational programs and does not deal with the legal status of these farms," it said. In practice, it is directing at-risk youth to join the settlers' extremist "hilltop youth."

*Like all of Israel's other national institutions, JNF completed its national mission once the state was established and should have been closed at that time. This is doubly true now that it has become the Settlement and Annexation National Fund.*³⁰

KKL-JNF and their local offices, including JNF KKL Scotland, are committed to Zionism and the ongoing erasure of the Palestinian people from their land and homes. Projects they support include establishing the Zionist Leadership Academy, where 'fifty young leaders chosen from all over the world will study and prepare themselves, upon graduation, to assume significant roles in their communities and in KKL-JNF offices worldwide'.³¹

Just as in the beginning of Israel's settler colonial project, KKL-JNF work with and supports the Israeli military. Funding raised in Scotland and around the world contributes to gardens and parks to celebrate military personnel, and to 'many projects for the benefit of IDF soldiers throughout the country, together with its friends worldwide'. Funding supports projects on military bases and at training centres.³²

²⁷ UK statement on the Golan Heights, <https://www.gov.uk/government/news/uk-statement-on-the-golan-heights>

²⁸ Israel's apartheid against Palestinians: Cruel system of domination and crime against humanity, <https://www.amnesty.org/en/documents/mde15/5141/2022/en/>

²⁹ Peace Now, https://peacenow.org.il/wp-content/uploads/2020/02/KKL_Settlement-Division-Fact-Sheet.pdf

³⁰ Haaretz, Editorial: The Jewish National Fund for Hilltop Youth and Annexation, 2 October 2023

³¹ KKL-JNF & WZO Establish the Zionist Leadership Academy, <https://www.kkl-jnf.org/about-kl-jnf/green-israel-news/green-israel-news-2021/new-zionist-leadership-academy.aspx>

³² Meeting Points for IDF Soldiers and their Families, <https://www.kkl-jnf.org/people-and-environment/community-development/soldier-family-meeting-points/>

Conclusion

The KKL-JNF and their local fundraising offices, of which JNF KKL Scotland is one, are not benign organisations established for the public good. Their proudly declared history, purpose and impact on people they have had a hand in making refugees, and their ongoing commitment to contribute to the ethnic cleansing of Palestinians from their homes clearly show they should never have been registered as a charity. The harm they cause far outweighs any public benefit they claim.

The claims by KKL-JNF and JNF KKL Scotland to be environmental organisations are nothing but a cover for a project of ethnic cleansing. The organisation continues to commit human rights violations and violations of international law to this day.

OSCR should not allow such an organisation to enjoy charity status, which only benefits a foreign government engaged in genocide, apartheid and ethnic cleansing. The significant benefits that JNF KKL Scotland and KKL-JNF Israel enjoy due to charity status lead directly to support for these crimes, for the military that perpetrates violations of international law and of human rights, and for violent settler organisations that are actively stealing Palestinian land.

For as long as JNF KKL Scotland and KKL-JNF continue to be registered as a charity in Scotland, OSCR will lose credibility and public trust. We urge OSCR to follow the Canada Revenue Agency decision to revoke the charity status of JNF Canada³³ and remove JNF KKL Scotland from the Scottish Charity Register immediately.

³³ L'Orient Today, Canadian Jewish National Fund loses final appeal to regain revoked charitable status, [9 June 2025](#)