

Foreign Ministry said that it took “its role in protecting the integrity of the international financial system extremely seriously. We remain committed to combating financial crime globally.”²⁹

USE OF FORCE, ARMS CONTROL, AND NON-PROLIFERATION

The United States and France Facilitate Cessation of Hostilities Between Israel and Hezbollah

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The United States and France have facilitated an “arrangement” for the cessation of hostilities between Hezbollah and Israel and the implementation of Security Council Resolution 1701.¹ The agreement committed Lebanon to “prevent Hezbollah and all other armed groups in the territory of Lebanon from carrying out any operations against Israel.”² And it committed Israel “not [to] carry out any offensive military operations against Lebanese targets, including civilian, military, or other state targets, in the territory of Lebanon by land, air, or sea.”³ The phased withdrawal of the Israel Defense Forces (IDF) from southern Lebanon and the deployment of the Lebanese Armed Forces (LAF) in their place were to be completed within sixty days, effectively creating a buffer zone between Israel and Hezbollah, which would no longer operate in that territory.⁴ The United States and France indicated to the Security Council that they were “working with both countries . . . to ensure that [the agreement] is fully implemented and enforced.”⁵ Reportedly, the United States, in an undisclosed side letter, also provided security-related assurances to Israel in connection with its withdrawal from Lebanon.⁶

Release, Van Hollen, Jacobs Confirm UAE Providing Weapons to RSF in Sudan, in Contradiction to Its Assurances to US (Jan. 24, 2025), at <https://www.vanhollen.senate.gov/news/press-releases/van-hollen-jacobs-confirm-uae-providing-weapons-to-rsf-in-sudan-in-contradiction-to-its-assurances-to-us> [<https://perma.cc/GGN3-Z4Z2>].

²⁹ Basillioh Rukanga & Mohanad Hashim, *US Accuses RSF of Sudan Genocide and Sanctions Its Leader*, BBC (Jan. 8, 2025), at <https://www.bbc.com/news/articles/c8j9j72lvdvo>.

¹ See Announcement of a Cessation of Hostilities and Related Commitments on Enhanced Security Arrangements and Toward the Implementation of UNSCR 1701 [hereinafter Cessation of Hostilities Agreement], reprinted in Letter Dated 29 November 2024 from the Permanent Representatives of France and the United States of America to the United Nations Addressed to the President of the Security Council, UN Doc. S/PRST/2025/1, Annex (Dec. 2, 2024) [hereinafter Letter to the Security Council].

² Cessation of Hostilities Agreement, *supra* note 1, para. 2.

³ *Id.*

⁴ *Id.*, para. 12. “Southern Lebanon” refers to what the agreement calls the “Southern Litani Area.”

⁵ Letter to the Security Council, *supra* note 1. In a presidential statement, the Council “welcome[d]” the arrangement, “expresse[d] its concerns about the reported violations,” “call[ed] on the parties to faithfully implement [its] provisions,” and “call[ed] for the full implementation of resolution 1701” and related resolutions. UN Doc. S/PRST/2025/1 (Jan. 16, 2025).

⁶ See 13 חדשות המלא, ומכתב הערבויות האמריקני המלא, [Details of the Ceasefire Agreement in the North – and the Full American Letter of Guarantees, News 13] (Nov. 26, 2024), at <https://13tv.co.il/item/news/politics/security/opy0g-904354623> [<https://perma.cc/Q2VA-EVSZ>] [hereinafter U.S. Side Letter].



Map accompanying the cessation of hostilities agreement.⁷ Source: TOI Staff, *Full Text: The Israel-Hezbollah Ceasefire Deal*, TIMES OF ISRAEL (Nov. 27, 2024), at <https://www.timesofisrael.com/full-text-the-israel-hezbollah-ceasefire-deal>.

⁷ This map was not included in the copy of the agreement submitted by France and the United States to the Security Council. Instead, the GPS coordinates of the line delineating the Southern Litani Area are provided in an enclosure following the agreement's text. See Cessation of Hostilities Agreement, *supra* note 1. The agreement refers to "the attached LAF Deployment Plan," which is defined as "the Southern Litani Area." *Id.*, para. 5. That area runs north of a portion of the Litani River in the sector opposite the Israeli town of Metulla, thus including territory that is beyond UNIFIL's area of operations. See UNIFIL Area of Operations Map (July

The most recent hostilities between Hezbollah and Israel began on October 8, 2023, when Hezbollah fired missiles and rockets at northern Israel in support of Hamas, which had attacked Israel from Gaza the day before.⁸ Sporadic exchanges of fire between Israel and Hezbollah continued until September 2024, when Israel, in a surprise move, detonated Hezbollah paggers and walkie-talkies.⁹ Israel then bombed Hezbollah-controlled areas of Lebanon, including in Beirut, and killed Hezbollah's leader, Hassan Nasrallah.¹⁰ Israeli ground forces subsequently crossed into Lebanon in order to eliminate Hezbollah's threat to Israel's northern communities. Hezbollah had an estimated stockpile of between 120,000 and 200,000 ballistic missiles and rockets and had dug tunnels that crossed the border, which Israel feared would result in an attack similar to the one from Gaza.¹¹ Since the fighting started, approximately 1.2 million people were displaced in Lebanon¹² and nearly seventy thousand in Israel.¹³ An estimated four thousand Lebanese have died, as have around one hundred and twenty Israelis.¹⁴ The war has caused physical damage and economic losses on both sides of the border, with the toll on Lebanon especially high.¹⁵

2024), at https://unifil.unmissions.org/sites/default/files/july_2024map_area_of_operations.pdf [<https://perma.cc/XHR6-AJPP>]. Lebanese Prime Minister Najib Mikati denied that any maps were included as part of the agreement. See *مخاوف من أن تؤدي الخروقات الإسرائيلية إلى فرط الهدنة: 6000 عنصر من الجيش جاهزون للانتشار فوراً* [Fears that Israeli Violations Could Lead to a Breakdown in the Truce: 6,000 Army Personnel Ready to Deploy Immediately], AL-AKHBAR (Dec. 10, 2024), at <https://al-akhbar.com/lebanon/815698/ع-6000-مخاوفمنانتؤديالخروقاتالإسرائيليةالفرطالهدنة>.

⁸ See *Israel, Hezbollah Exchange Artillery, Rocket Fire*, REUTERS (Oct. 8, 2023), at <https://www.reuters.com/world/middle-east/israel-strikes-lebanon-after-hezbollah-hits-shebaa-farms-2023-10-08>.

⁹ See Sheera Frenkel, Ronen Bergman & Hwaida Saad, *How Israel Built a Modern-Day Trojan Horse: Exploding Paggers*, N.Y. TIMES (Sept. 20, 2024), at <https://www.nytimes.com/2024/09/18/world/middleeast/israel-exploding-pagers-hezbollah.html>.

¹⁰ See Patrick Kingsley & Euan Ward, *Israel's Strikes on Lebanon Are Some of the Deadliest in Decades*, N.Y. TIMES (Sept. 24, 2024), at <https://www.nytimes.com/2024/09/24/world/middleeast/israel-lebanon-strikes-deaths.html>; Ronen Bergman & Patrick Kingsley, *Israel Tracked Nasrallah for Months Before Assassination, Officials Say*, N.Y. TIMES (Sept. 28, 2024), at <https://www.nytimes.com/2024/09/28/world/middleeast/why-israel-assassinate-nasrallah.html>.

¹¹ See Seth G. Jones, Daniel Byman, Alexander Palmer & Riley McCabe, *The Coming Conflict with Hezbollah*, CTR. STRATEGIC & INT'L STUD. (Mar. 2024), at https://csis-website-prod.s3.amazonaws.com/s3fs-public/2024-03/240321_Jones_Coming_Hezbollah.pdf [<https://perma.cc/48AC-X5AS>]; Isabel Kershner, *Israel Calls for International Action Against Hezbollah Tunnels*, N.Y. TIMES (Dec. 19, 2018), at <https://www.nytimes.com/2018/12/19/world/middleeast/israel-calls-for-international-action-against-hezbollah-tunnels.html>.

¹² See Dalal Harb & Houssam Hariri, *Displaced Families in Lebanon Yearn for Peace and a Return Home*, UNHCR (Oct. 6, 2024), at <https://www.unhcr.org/news/stories/displaced-families-lebanon-yearn-peace-and-return-home> [<https://perma.cc/K7KM-ZBRM>] (citing the estimate of the Government of Lebanon). The International Organization for Migration estimated that there were 875,180 displaced persons in Lebanon by November 2024. See International Organization for Migration, *Crisis in Lebanon* (Dec. 18, 2024), at <https://www.iom.int/crisis-lebanon> [<https://perma.cc/G66T-EJ3U>].

¹³ See Israeli Knesset Research and Information Center, *נתונים מעודכנים על מפונים מהצפון ומדרום [Updated Data on Evacuees from the North and the South]* (July 3, 2024), at https://fs.knesset.gov.il/globaldocs/MMM/bb4ad946-3c2d-ef11-815f-005056aac6c3/2_bb4ad946-3c2d-ef11-815f-005056aac6c3_11_20597.pdf [<https://perma.cc/JRU7-A34K>].

¹⁴ See Julia Frankel & Abby Sewell, *The Israel-Hezbollah War by the Numbers*, AP (Nov. 27, 2024), at <https://apnews.com/article/israel-lebanon-war-numbers-hezbollah-military-6f1a651ebba0a88fbd7ca59a57acd1e>. The number of deaths include participants in the hostilities.

¹⁵ A World Bank report found that the "cost of physical damages and economic losses due to the conflict in Lebanon is estimated at US\$8.5 billion." World Bank Group Press Release, *New World Bank Report Assesses Impact of Conflict on Lebanon's Economy and Key Sectors* (Nov. 14, 2024), at <https://www.worldbank.org/en/news/press-release/2024/11/14/new-world-bank-report-assesses-impact-of-conflict-on-lebanon-s-economy-and-key-sectors> [<https://perma.cc/LFM3-6WT2>].

Hezbollah's effective control of southern Lebanon was contrary to Resolution 1701. That resolution called for the cessation of hostilities between Hezbollah and Israel following Hezbollah's attack on Israel in July 2006.¹⁶ With the end of the fighting, Lebanon and the United Nations Interim Force in Lebanon (UNIFIL) were to deploy in southern Lebanon as Israel withdrew its forces.¹⁷ The resolution "[e]mphasize[d] the importance of the extension of the control of the Government of Lebanon over all Lebanese territory . . . for it to exercise its full sovereignty, so that there will be no weapons without the consent of the Government of Lebanon and no authority other than that of the Government of Lebanon."¹⁸ It also stipulated that there would be "no foreign forces in Lebanon without the consent of its Government."¹⁹ Israel withdrew, but Lebanon did not take steps to demilitarize Hezbollah or displace Hezbollah's authority. Instead, Hezbollah, with Iran's assistance, grew to become one of the world's most powerful non-state actors, and it deployed its forces across southern Lebanon, including along the Blue Line separating Israel and Lebanon.²⁰ Though the border had been relatively quiet since 2006, skirmishes continued until October 2023. Israel's ground invasion sought to remove Hezbollah while it had the military advantage.

The November 2024 cessation of hostilities agreement was negotiated in the shadow of Resolution 1701's non-implementation. It was framed as an "announcement" by France and the United States of their "understandings" of commitments made by Israel and Lebanon regarding the cessation of hostilities.²¹ The agreement specifies, in greater detail than had Resolution 1701, Lebanese security obligations in southern Lebanon. Lebanon stipulates that, aside from UNIFIL, its "official military and security forces, infrastructure, and weaponry will be the only armed groups, arms, and related materiel deployed in the southern Litani area."²² It agrees that it will regulate and control "any sales or supply of arms and related

¹⁶ SC Res. 1701, para. 1 (2006).

¹⁷ *Id.*, para. 2.

¹⁸ *Id.*, para. 3 (emphasis removed).

¹⁹ *Id.*, para. 8.

²⁰ See Matthew Mpoke Bigg, *What We Know About Hezbollah's Military Capability*, N.Y. TIMES (Oct. 1, 2024), at <https://www.nytimes.com/article/hezbollah-military-capability.html>; Nicholas Blanford, *Hezbollah's Assertive Posture in South Lebanon Places UNIFIL in a Difficult Position*, ATLANTIC COUNCIL (Sept. 27, 2023), at <https://www.atlanticcouncil.org/blogs/menasource/hezbollahs-posture-unifil-israel> [<https://perma.cc/NZA9-BLM6>]. The Blue Line refers to the line identified by the UN secretary-general for the purpose of confirming that Israel had withdrawn from Lebanon in 2000 in accordance with Security Council Resolution 425 (1978). See Report of the Secretary-General on the Implementation of Security Council Resolutions 425 (1978) and 426 (1978), paras. 6–11, UN Doc. S/2000/590 (June 16, 2000). It is not an agreed international boundary.

²¹ This indirect form of agreement—whereby the primary parties consent to the "understanding" of a third-party interlocutor concerning the parties' commitments—was also employed in the 2022 maritime agreement between Israel and Lebanon. See Exchange of Letters Constituting a Maritime Agreement Between the State of Israel and the Lebanese Republic (Oct. 27, 2022), at <https://treaties.un.org/doc/Publication/UNTS/No%20Volume/57582/Part/I-57582-08000002806029d5.pdf> [<https://perma.cc/T62M-HTQ9>]. The announced "cessation of hostilities" (the term also used in Resolution 1701) was not a "ceasefire" agreement. Lebanon was not a participant in the hostilities and so it could not cease them. Hezbollah, a non-state actor, could not itself enter into an international agreement. The "arrangement" (the word used by France and the United States to describe the deal) would not have transpired, however, without Hezbollah's concurrence, and so while not formally a ceasefire agreement, Hezbollah's consent to the cessation of hostilities was clearly an informal prerequisite. The agreement announced by France and the United States was also not binding under international law. It contained non-binding language—using the words "will" and not "shall" for example—and was not signed by either Israel or Lebanon. Resolution 1701 already imposed binding obligations.

²² Cessation of Hostilities Agreement, *supra* note 1, para. 5.

materiel into Lebanon” and “all production of arms . . . within Lebanon.”²³ It also pledges to “[m]onitor and enforce [throughout Lebanon] against any unauthorized entry of arms” and “the unauthorized production of arms” and to “dismantle all existing unauthorized facilities involved in the production of arms.”²⁴

The agreement also incorporates for the first time French and U.S. commitments to support Lebanon and to monitor and verify the deal’s enforcement. France and the United States commit to work within the Military Technical Committee for Lebanon²⁵ to enable the deployment of 10,000 LAF soldiers in southern Lebanon and to improve the LAF’s capabilities.²⁶ France and the United States, as chair, will also join the existing tripartite mechanism that includes the IDF, LAF, and UNIFIL, which now “will monitor, verify, and assist in ensuring enforcement of [Israel’s and Lebanon’s] commitments.”²⁷ A senior U.S. official said that, “unlike in 2006 where the international community reached the agreement and then abandoned the scene, here we remain committed to be on the ground day to day.”²⁸

Israel commits in the agreement to a phased withdrawal south of the Blue Line within sixty days “in parallel” with the deployment of the LAF and the commencement of the LAF’s commitments, including the dismantling of unauthorized sites and the confiscation of unauthorized arms.²⁹ Though the agreement excludes Israel from “carry[ing] out any offensive military operations against Lebanese targets,” it does not preclude Israel “from exercising [its] inherent right of self-defense, consistent with international law.”³⁰

Concerned with the risk of Hezbollah’s rearmament and return to southern Lebanon following Israel’s withdrawal, Israel sought and received security assurances from the United States in a confidential side letter, excerpts of which were leaked.³¹ In the letter, the United States “recognize[s] Israel’s right to respond to threats coming from [southern] Lebanese territory, ‘in accordance with international law.’”³² The United States assures Israel of its “right to act [outside of southern Lebanon] against the development of threats directed against it, if Lebanon is unable or unwilling to thwart these threats—including

²³ *Id.*, para. 6.

²⁴ *Id.*, para. 7.

²⁵ Chaired by Italy, the Military Technical Committee includes seven other countries, including France and the United States, and has as its objectives “restoring the security conditions . . . in southern Lebanon through the support to Lebanese Armed Forces” and “facilitating the return of displaced people.” Italian Ministry of Defense Press Release, Lebanon: Italian-Led Military Technical Committee Starts Its First Operational and Training Activities (Aug. 30, 2024), at https://www.esercito.difesa.it/en/News/Pagine/Italian-led-Military_Technical_Committee.aspx [<https://perma.cc/J7H-M65Y>].

²⁶ See Cessation of Hostilities Agreement, *supra* note 1, para. 8.

²⁷ See *id.*, para. 9; see also *id.*, para. 10 (“Israel and Lebanon will report any alleged violations to the Mechanism and UNIFIL . . . [and the] Mechanism will develop appropriate procedures to consult, inspect, gather information, and assist in ensuring the enforcement of these commitments.”). The mechanism was originally established to coordinate Israel’s 2006 withdrawal and subsequently became a forum for the LAF and IDF to work through contentious issues. See UNIFIL Press Release, Lázaro Calls for “Constructive Outcomes” on Contentious Issues Along the Blue Line (May 19, 2022), at <https://unifil.unmissions.org/l%C3%A1zaro-calls-%E2%80%9998constructive-outcomes%E2%80%9999-contentious-issues-along-blue-line> [<https://perma.cc/PZB4-8WX6>].

²⁸ White House Press Release, Background Press Call on the Ceasefire Deal Between Israel and Lebanon (Nov. 26, 2024), at <https://bidenwhitehouse.archives.gov/briefing-room/press-briefings/2024/11/26/background-press-call-on-the-ceasefire-deal-between-israel-and-lebanon> [<https://perma.cc/CM9L-4XF4>].

²⁹ See Cessation of Hostilities Agreement, *supra* note 1, para. 12.

³⁰ *Id.*, paras. 2, 4.

³¹ See U.S. Side Letter, *supra* note 6.

³² *Id.*

the introduction of illegal weapons into Lebanon through borders and crossings” (in which case it will inform the United States).³³ The letter provides that Israel would conduct flights over Lebanon “for intelligence, surveillance and reconnaissance purposes only, . . . as invisible to the naked eye as possible, and will not break the sound barrier.”³⁴ Israel and the United States indicate, as well, that they “intend to share sensitive intelligence regarding violations, including any infiltration by Hezbollah into the Lebanese army.”³⁵ The United States agrees to cooperate with Israel to stymie Iranian activities in Lebanon, including preventing the transfer of weapons and personnel from Iran.³⁶ In a public statement announcing the cessation of hostilities agreement, President Joseph R. Biden, Jr. remarked: “If Hezbollah or anyone else breaks the deal and poses a direct threat to Israel, then Israel retains the right to self-defense consistent with international law, just like any country when facing a terrorist group pledged to that country’s destruction.”³⁷

Israeli forces did not withdraw across the Blue Line within sixty days, as the agreement provided. Two days before the deadline, the Israeli Prime Minister’s Office stated that “[s]ince the ceasefire agreement has yet to be fully enforced by the Lebanese state, the gradual withdrawal process will continue, in full coordination with the US.”³⁸ At the time, according to a UNIFIL spokesperson, Israel still held approximately seventy percent of the land it had captured.³⁹ Israel expressed concern that Hezbollah was not leaving southern Lebanon and Lebanese forces were not ready to take control of the area. During this period, Israel targeted Hezbollah activities in southern Lebanon that it says violated the terms of the agreement, including in response to a surveillance drone launched at Israel.⁴⁰ Lebanon reportedly carried out five hundred missions to confiscate weapons and dismantle Hezbollah infrastructure.⁴¹ Lebanon also lodged complaints with the United Nations regarding what it claimed were Israeli violations of the agreement.⁴² UNIFIL, according to Secretary-General António

³³ *Id.*

³⁴ *Id.*

³⁵ *Id.*

³⁶ *See id.*

³⁷ White House Press Release, Remarks by President Biden Announcing Cessation of Hostilities Between Israel and Hezbollah (Nov. 26, 2024), at <https://bidenwhitehouse.archives.gov/briefing-room/speeches-remarks/2024/11/26/remarks-by-president-biden-announcing-cessation-of-hostilities-between-israel-and-hezbollah> [https://perma.cc/PT6P-UYT5].

³⁸ Israel Ministry of Foreign Affairs Press Release, IDF Withdrawal from Lebanon: Prime Minister’s Office Statement (Jan. 24, 2024), at <https://www.gov.il/en/pages/idf-withdrawal-from-lebanon-pmo-statement-24-jan-2025> [https://perma.cc/HQ9V-YXJ9].

³⁹ *See* Patrick Kingsley, Ronen Bergman & Natan Odenheimer, *Israel Appears Poised to Keep Its Troops in Lebanon Beyond Deadline*, N.Y. TIMES (Jan. 24, 2024), at <https://www.nytimes.com/2025/01/24/world/middleeast/israel-lebanon-hezbollah-withdrawal-deadline.html>.

⁴⁰ *See, e.g.*, Emanuel Fabian & TOI Staff, *IDF Shoots Down Hezbollah Surveillance Drone, in First Such Incident Since Ceasefire*, TIMES OF ISRAEL (Jan. 30, 2025), at <https://www.timesofisrael.com/idf-shoots-down-hezbollah-surveillance-drone-in-first-such-incident-since-ceasefire>; Emanuel Fabian & TOI Staff, *IDF Says It Struck Hezbollah Arms Convoy in Lebanon; Beirut Reports 14 Wounded*, TIMES OF ISRAEL (Jan. 28, 2025), at <https://www.timesofisrael.com/idf-says-it-struck-hezbollah-arms-convoy-in-lebanon-beirut-reports-14-wounded>.

⁴¹ *See* Nazeer Rida, *Lebanese Army Conducts 500 Missions to Dismantle Hezbollah Infrastructure South of Litani River*, ASHARQ AL AWSAT (Jan. 24, 2025), at <https://english.aawsat.com/arab-world/5104646-lebanese-army-conducts-500-missions-dismantle-hezbollah-infrastructure-south>.

⁴² *See, e.g.*, Identical Letters Dated 23 December 2024 from the Chargé d’affaires a.i. of the Permanent Mission of Lebanon to the United Nations Addressed to the Secretary-General and the President of the Security Council, UN Doc. A/79/706-S/2024/963 (Dec. 26, 2024).

Guterres, “uncovered over a 100 weapons caches belonging to Hezbollah or other armed groups.”⁴³ As the deadline for Israel’s withdrawal was about to expire, the White House announced an extension until February 18, 2025.⁴⁴ Israel departed by that date, except for what an Israeli military spokesperson described as “small amounts of troops deployed temporarily in five strategic points along the border.”⁴⁵

⁴³ See UN Press Release, Secretary-General’s Remarks at UNIFIL Headquarters [as Delivered] (Jan. 17, 2025), at <https://www.un.org/sg/en/content/sg/statement/2025-01-17/secretary-generals-remarks-unifil-headquarters-delivered> [<https://perma.cc/TMU5-75G5>].

⁴⁴ See White House Press Release, White House Statement on Agreement Extension Between Lebanon and Israel (Jan. 26, 2025), at <https://www.whitehouse.gov/briefings-statements/2025/01/white-house-statement-on-agreement-extension-between-lebanon-and-israel> [<https://perma.cc/P9PG-8TE9>].

⁴⁵ Feliz Solomon, *Israel Will Stay in Strategic Villages in Lebanon Past Deadline to Pull Out*, WALL. ST. J. (Feb. 17, 2025), at <https://www.wsj.com/world/middle-east/israel-will-stay-in-strategic-villages-in-lebanon-past-deadline-to-pull-out-507a3fa8> (quoting Lt. Col. Nadav Shoshani).