

May 16, 2024

**Sundar Pichai**  
CEO, Alphabet Inc.

CC: Thomas Kurian, CEO of Google Cloud

Dear Mr. Pichai,

We are writing to you to seek clarification regarding Google’s potential contribution to atrocity crimes and [grave violations of international law](#) perpetrated by the Israeli military in the Gaza Strip, and to demand that the company disclose how its technologies and digital services, including through Project Nimbus, may be used by the Israeli authorities for military ends.

A number of [media investigations](#) have recently revealed the [usage](#) of AI systems by the Israeli army to automatically generate targets to be bombed during its current war on Gaza. Among those systems is “[Lavender](#),” which analyzes data related to Gaza’s overall population to rank the likelihood of individuals being affiliated with Hamas— generating kill lists to be bombed with “dumb bombs” that cause incalculable destruction and death. Lavender is coupled with another dystopian tracking system named “Where’s Daddy?” which tracks the marked individuals in real time and bombs their family homes once they enter the building. During the first weeks of the war, reports allege that the Israeli army almost completely relied on Lavender and that soldiers were pressured to generate more targets to bomb without due diligence or oversight. The system has reportedly generated as many as 37,000 Palestinians as targets. As a result, tens of thousands of Palestinians — [70% of them are women and children](#)— were wiped out and entire neighborhoods were pulverized.

Shortly after the revelations of the use of Lavender, it was reported that Google [deepened its business relations with Israel](#) during the war and signed a new contract with the Israeli Ministry of Defense to allow “multiple units” access Google’s automation technologies. With knowingly and persistently continuing to provide services and digital infrastructure to the Israeli government, which are likely to be used to commit international crimes and other serious breaches of international law, Google is risking serious consequences for possibly aiding and/or abetting the commission of international crimes, including genocide.

**The horrifying use of AI warfare in Gaza and Google’s expanding relationship with the Israeli government begs the question: To what extent does the Israeli military and intelligence apparatus employ Google’s cloud computing and AI services, infrastructure, and systems for the mass slaughter of innocent civilians and the mass destruction of the Gaza Strip?** In 2021, Google signed a \$1.2 billion contract jointly with Amazon, known as [Project Nimbus](#), to provide cloud computing services to the Israeli government and its military. Whereas Google has [repeatedly claimed](#) that its contract with the Israeli government is “not directed at highly sensitive, classified, or

military workloads relevant to weapons or intelligence services,” multiple sources and documentation revealed so far about Project Nimbus paint a different picture. In 2022, The Intercept [revealed](#) —based on training materials related to Project Nimbus— that Google is providing the Israeli government with a wide-range of machine-learning and AI capabilities including “facial detection, automated image categorization, object tracking, and even sentiment analysis that claims to assess the emotional content of pictures, speech, and writing.” The documents referenced the Israeli Ministry of Defense as an example of government agencies that could benefit from Google’s training. A statement by the Israeli Ministry of Finance [also publicly lists](#) the Ministry of Defense and the Israel Defense Force (IDF) as partners to Project Nimbus.

Another [63-page Israeli government procurement document](#), also [disclosed](#) by The Intercept, shows a list of Israeli companies and government offices, including two of Israel’s leading state-owned weapons manufacturers, Israel Aerospace Industries (IAI) and Rafael Advanced Defense Systems, that are possible clients to Google’s cloud computing services. IAI manufactures drones and other weapons that [have long been used](#) to [bomb civilians](#) in Gaza since 2008. It also sold its aerospace technology to [Myanmar](#)’s military following the coup. Rafel makes, among others, Spike missiles which have been used in Gaza, including [likely in the targeting](#) of the World Central Kitchen aid workers. Among other potential cloud customers of Google is also the [The Settlement Division of the World Zionist Organization](#), a non-governmental agency [entrusted by the Israeli government](#) to establish and develop Israeli settlements in the Occupied West Bank. It should be emphasized here that Israeli settlements have long been [considered illegal under international law](#) and [amount to war crimes](#) under the Rome Statute of the International Criminal Court.

While Google [insists](#) that it “will not design or deploy AI applications as weapons or weapons systems, or for mass surveillance,” a recent investigation by the New York Times [further revealed](#) that the Israeli army is using Google Photos to identify Palestinians in Gaza through a facial recognition scheme which captures and catalogs the faces of Palestinians without their knowledge or consent. One Israeli intelligence officer has even praised Google’s ability to match faces and identify people even with only a small portion of their face visible. This mass biometric surveillance system, partially powered by Google, has led to the [arbitrary detention of Palestinian poet Mosab Abu Toha](#), who was stopped at an Israeli military checkpoint while fleeing with his family on November 19, 2023. Abu Toha was [identified through the facial recognition system](#), then was blindfolded and taken to an Israeli detention center where he was interrogated and beaten then returned to Gaza with no explanation. According to the [UN Human Rights Office](#), the Israeli military in Gaza has [detained and forcibly disappeared thousands](#) of Palestinian men, women, and children who are secretly held in undisclosed detention camps where they are “beaten, humiliated, subjected to ill-treatment, and to what may amount to torture.” Based on the above evidence, it appears that tools provided by Google are facilitating these human rights abuses.

On January 26, 2024, the International Court of Justice (ICJ) [determined the plausibility of genocide](#) committed by Israel against the Palestinian people in Gaza and ordered the State of Israel to prevent the crime of genocide, a “real and imminent risk.” A month later, the ICJ proceeded with hearings at the [UN’s request for an Advisory Opinion](#) on the legal consequences of Israel’s military occupation, including its “continuing systematic violation of the human rights of the Palestinian people.” As [noted by over 40 scholars and practitioners](#) on business and human rights, “[t]hese allegations, together with extensive media reporting on likely war crimes, crimes against humanity, and violations of international humanitarian law, impute to businesses knowledge of the unlawful nature of Israeli military activity in the West Bank and Gaza Strip.” This knowledge is not only publicly attainable by Google, but its own employees have also [actively protested](#) over Project Nimbus and the company’s possible complicity in genocide and were met with mass firing, censorship, and retaliation.

The UN Guiding Principles on Business and Human Rights, which [Google publicly subscribes to](#), make it clear that businesses operating in armed conflict zones can risk “[being complicit in gross human rights abuses committed by other actors](#),” and therefore should treat such risk as a legal compliance issue. Companies are expected to avoid causing or contributing to human rights abuses and to mitigate human rights impacts that are directly linked to their business operations and relationships. Where they cannot mitigate such risks, they should terminate their business relationship with the actors involved in such violations. Instead of reconsidering and eventually terminating the Project Nimbus contract, Google has [terminated the contracts of over 50 of its tech workers](#) in shocking retaliation over their legitimate protests, and expanded its services to the Israeli Ministry of Defense.

Over the past seven months, the world has witnessed one of the most destructive and atrocious wars in modern history. With over 35,000 Palestinians killed, including one child dying every ten minutes, Google can no longer enjoy conducting business as usual with a client responsible for such death and destruction.

**In light of the above, we respectfully request an honest and public accounting of Google’s current business relations with the Israeli government and transparently provide information on the following matters:**

- Precisely, what services and technologies does Google provide to the Israeli government and for what purposes? Which ministries or government agencies have access to these services?
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- Who are the contractual public and private clients of Google under Project Nimbus?
    - According to a [draft contract dated March 27, 2024](#) and revealed by the Times, the Israeli Ministry of Defense “sought consulting assistance from Google to expand its Google Cloud access, seeking to allow “multiple units” to access automation technologies”. Which units would have access to these services?

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- Has Google conducted a human rights due diligence (HRDD) with respect to establishing a cloud computing infrastructure for the Israeli government?
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- What measures has Google taken to mitigate the adverse human rights impacts, including gross violations of international law, linked to providing machine learning and cloud computing services to the Israeli government?
    - In light of Google's [AI Principles](#) which prohibit the design and deployment of AI technologies that cause overall harm, gather or use information for surveillance, or contravene international law, please outline concrete steps Google has taken to ensure their technologies, including Google Photos, are not contributing to the targeting, killing, arbitrary detention of civilians, and other human rights abuses in Gaza.
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- In light of the Israeli government's obligatory customers list, what measures has Google taken to conduct customer due diligence in order to mitigate potential risks on how Google's customers use its products and services?
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We would greatly appreciate it if you could respond to our questions by **May 30, 2024**. We also welcome the opportunity to meet with you to further discuss these issues at your earliest possibility.

Sincerely,

Access Now

**Access Now (<https://www.accessnow.org>)** defends and extends the digital rights of people and communities at risk around the world. By combining direct technical support, comprehensive policy engagement, global advocacy, grassroots grantmaking, legal interventions, and convenings such as RightsCon, we fight for human rights in the digital age.